U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 5
EMERGENCY PLANNING & COMMUNITY RIGHT-TO-KNOW
INSPECTION REPORT

INSPECTION REPORT COVER SHEET

FACILITY NAME & ADDRESS Mid-America Steel Drum Company 8570 South Chicago Road Oak Creek, Wisconsin 53154	**INSPECTION START DATE/TIME** March 2, 2017, at 9:00 am **INSPECTION END DATE /TIME** March 2, 2017, at 1:45 pm	**TYPE OF EPCRA INSPECTION** 311 312 **EPA FACILITY IDENTIFIER #**
EPA INSPECTOR IN CHARGE James Entzminger	**TITLE** EPCRA Inspector	**PHONE NUMBER** (312) 886-4062
OTHER EPA INSPECTORS PRESENT Brenda Whitney Kathryn Halbur	**TITLES** RCRA Inspector On-Scene Coordinator	**PHONE NUMBERS** (312) 353-4796 (920) 662-5424
FACILITY REPRESENTATIVES Mike Higgins Ian Boyle, CLCM Scott Bush, Greif, Inc. Steele Johns, Greif, Inc. Kevin Meyer, CLCM	**TITLE** General Manager Corporate Environmental Corporate Safety Plant Manager	**PHONE NUMBER** (414) 762-1114
OTHER INDIVIDUALS PRESENT Linda Benfield, Foley & Lardner, LLP Sarah Slack, Foley & Lardner, LLP Mike Griffin, WDNR Curt Nickels, WDNR Eric Amadi, WDNR Cathy Baerwald, WDNR Pete Wood, WDNR Tiffany Ziemer, US DOT/PHMSA Ted Turner, US DOT/PHMSA	**TITLE** Attorney Attorney Air Inspector Wastewater Inspector Remediation & Redevelopment Inspector Storm Water Inspector Waste Management Inspector Hazmat Transportation Inspector Hazmat Transportation Inspector	**PHONE NUMBER** (414) 297-5825 (414) 319-7037 (414) 263-8554 (920) 893-8530 (414) 263-8639 (414) 263-8698 (262) 884-2360 (701) 219-3249 (847) 294-8580

DESCRIPTION OF FACILITY

Mid-America Steel Drum Company (Mid-America) is located in a mixed residential and industrial area in Oak Creek, Wisconsin (Attachment 1). There is an old land-fill across the fence to the north of the facility. There are residential dwellings about 800 feet north of the facility, about 800 feet east, about 500 feet south, and west across Chicago Road. In addition, an elementary school is located about 4,000 feet northwest of the facility, and a water treatment plant is located about 4,000 feet east, on the shore of Lake Michigan.

Container Lifecycle Management, LLC (CLCM), is an indirect joint-venture subsidiary of Greif, Inc. On November 4, 2013, CLCM purchased the operating assets of Mid-America and entered into a lease agreement with Mid-America, which remained to operate the business.

CLCM has 57 employees in Oak Creek, Wisconsin, and 120 employees corporate wide. CLCM operates facilities in Oak Creek, Milwaukee, and St. Francis, Wisconsin; Indianapolis, Indiana; Memphis, Tennessee; and Arkadelphia, Arkansas.

Mid-America receives 55-gallon steel drums and reconditions them for reuse. Drums that cannot be reconditioned are destroyed.

OPENING CONFERENCE

The following people participated in the inspection:

For the EPA:

- James Entzminger, Emergency Planning and Community Right-to-Know Act (EPCRA) inspector,
- Brenda Whitney, Resource Conservation and Recovery Act (RCRA) inspector, and
- Kathryn Halbur, On-Scene Coordinator;

For Greif, Inc.:

- Mike Higgins, General Manager,
- Ian Boyle, Corporate Environmental, CLCM,
- Scott Bush, Greif, Inc.
- Steele Johns, Corporate Safety,
- Kevin Meyer, Plant Manager, CLCM,
- Robert Janowski, CLCM,
- Linda Benfield, Attorney, Foley & Lardner, LLP representing Greif, Inc., and
- Sarah Slack, Attorney, Foley & Lardner, LLP representing Greif, Inc.;

For the Wisconsin Department of Natural Resources:

- Mike Griffin, CAA Inspector,
- Curt Nickels, Waste Water Inspector,
- Eric Amadi, Remediation and Redevelopment Inspector,
- Cathy Baerwald, Storm Water Inspector, and
- Peter Wood, Waste Management Inspector; and

For the U.S. Department of Transportation, under the auspices of the Pipeline and Hazardous Materials Safety Act:

- Tiffany Ziemer, Hazmat Inspector, and
- Ted Turner, US DOT/PHMSA Hazmat Inspector.

Linda Benfield asked the participants to write their names, affiliations, and email addresses on the attendance sheet (Attachment 2). James Entzminger prepared the Notice of Inspection Form, and the signed Form is Attachment 3.

James Entzminger presented his EPA Inspector Credentials. Linda Benfield stated that any photos and information collected would be considered Confidential Business Information (CBI) until a further determination could be made concerning CBI. Photos taken during the inspection are in Attachment 4. Steele Johns informed the inspectors that the personnel protective equipment requirements included a hard hat, safety glasses with side-shields, hearing protection, and steel-toe shoes.

The RCRA inspection report will be prepared separately.

INSPECTOR'S FINDINGS

Mike Higgins, Ian Boyle, Scott Bush, Steele Johns, Mark Ferguson, Robert Janowski, Linda Benfield, and Sarah Slack accompanied James Entzminger, Brenda Whitney, and Kathryn Halbur on their site tour. Other participants included Mike Griffin, Curt Nickels, Eric Amadi, Cathy Baerwald, and Peter Wood. Tiffany Ziemer and Ted Turner were given a separate site tour.

The site tour began at the diesel fuel storage tank, where the drivers refuel their trucks. The diesel fuel is stored expressly for this purpose. Mike Higgins stated that the above-ground diesel tank had a capacity of 2,000 to 3,000 gallons, but information obtained later from Mid-America showed the tank capacity is actually 4,000 gallons. The maximum amount of diesel fuel is (4,000 gallons)(7 pounds per gallon) = 28,000 pounds, which is greater than the 10,000-pound reporting threshold. The maximum amount of diesel fuel listed on the revised Emergency and Hazardous Chemical Inventory Form (Tier II Form) for calendar year 2016, submitted on March 8, 2017, is 27,600 pounds. Mid-America reported that the diesel tank was installed in 1999.

No secondary containment for the diesel fuel tank was observed, but Mike Higgins did not know if it was a single-wall or a double-wall tank. The general slope of the property is from South Chicago Road toward the back of the property, where James Entzminger observed a marsh area that contained water. If the tank leaks, the spill would run into the marsh.

On July 12, 2017, Mid-America provided that tank specifications and construction drawings for the 4,000-gallon above-ground diesel fuel tank (Attachment 5). The diesel fuel tank is a double-wall tank and it was installed in 1999.

The next stop was the maintenance garage, which contained 55-gallon drums of oil, kerosene, and other chemicals used to maintain the equipment.

Then the inspectors proceeded to the loading dock, where 55-gallon drums for reconditioning are off-loaded from the trailers. Mike Higgins stated that some of the drums or other intermediate bulk containers are not

RCRA "empty" when they arrive. Those containers are placed in a separate area until they can be returned to the facilities that sent them to Mid-America.

James Entzminger observed a fork-lift truck powered by propane. Mike Higgins stated that Mid-America has four fork-lift trucks powered by propane. Each fork-lift truck uses one propane cylinder as its fuel source. In addition, eight spare propane cylinders are stored in a cage. Each propane cylinder contains 80 pounds of propane; therefore, the maximum amount of propane is (4+8)(80 pounds) = 960 pounds, which is less than the 10,000-pound reporting threshold.

James Entzminger observed a natural gas furnace and a thermal oxidizer that operates at 1,700° F.

After the tour went through the various process areas, the inspectors proceeded to the chemical storage area. James Entzminger observed eight pallets of 55-gallon drums of VOC 3.50 paint. Each pallet contained four 55-gallon drums; therefore, there are: (8)(4)(55 gallons) = 1,760 gallons of paint. There were two paints listed as 3.50 VOC paint. The 3.50 VOC red sterilkote 300 has a specific gravity of 1.06 and 3.50 VOC buff sterilkote 46 has a specific gravity of 1.1. The maximum amount of 3.50 VOC paint equals (1,760 gallons)(1.1 specific gravity)(8.34 pounds per gallon of water) = 16,146.24 pounds, which is greater than the 10,000-pound reporting threshold.

The maximum amount of solvent-based paint Mid-America listed on its Tier II Form for calendar year 2016, submitted on February 21, 2017, was 10,000 pounds. The maximum amount of water-based paint Mid-America listed on its Tier II Form for calendar year 2016, submitted on February 21, 2017, was 25,000 pounds. These quantities are equal to or greater than the 10,000-pound reporting threshold for hazardous chemicals.

The most recent Tier II Form from Mid-America that the Wisconsin State Emergency Response Commission had on file prior to the inspection was for calendar year 2015, submitted on January 19, 2016. The only chemical quantity cited on this Tier II Form was 1,500 pounds of sulfuric acid, which is greater than the 500-pound reporting threshold (Attachment 6). A note on Mid-America's Tier II Form for calendar year 2016 states that the sulfuric acid was removed from the site as of June 1, 2015.

Mid-America did not present any documentation for review during the inspection. On April 14, 2017, the EPA mailed an information request to the attorney representing Greif, Inc. (Attachment 7).

On June 8, 2017, Mid-America responded to the information request (Attachment 8), confirming that CLCM purchased its operating assets and entered into a lease agreement with it on November 4, 2013. Mid-America provided its Tier II Forms for calendar years 2013-2016 (Attachment 9) and Material Safety Data Sheets (Attachment 10).

James Entzminger used the EPCRA INSPECTION REPORT (302-312) as a guide for the inspection and made notes on the report (Attachment 11).

Based on the information gathered as part of the investigation, Mid-America did not include diesel fuel on the Tier II forms for calendar years 2013-2015.

CLOSING CONFERENCE		
After the inspection was completed, James Entzminger, Brenda Whitney, and Kathryn Halbur met with Mike Higgins, Ian Boyle, Scott Bush, Steele Johns, Kevin Meyer, Robert Janowski, Linda Benfield, and Sarah Slack. Other participants in the meeting included Mike Griffin, Curt Nickels, Eric Amadi, Cathy Baerwald, Peter Wood, Tiffany Zimmer, and Ted Turner. James Entzminger provided the specific EPCRA inventory reporting requirements for diesel fuel and the VOC 3.50 paint.		
Names and Signature of Inspector James Entzminger **James Entzminger**	**Agency/Office/Telephone Number** **US EPA/CEPPS** **(312) 886-4062**	**Date** August 4, 2017
Name and Signature of Reviewer **Michael E. Hans**	**Agency/Office** **USEPA/Region 5/ Chief CEPPS**	**Date** 8-9-17

Attachments:

- **Attachment 1 - GOOGLE Aerial Photographs**
- **Attachment 2 – Attendance Sheet**
- **Attachment 3 - Notice of Inspection Form**
- **Attachment 4 – Photographs**
- **Attachment 5 – email and tank specifications and drawings**
- **Attachment 6 - Tier Form obtained from SERC**
- **Attachment 7 – EPCRA Information Request**
- **Attachment 8 – EPCRA Information Request Response**
- **Attachment 9 – Tier Forms obtained from the Mid-America**
- **Attachment 10 - MSDSs**
- **Attachment 11 – EPCRA Inspection Report (302-312)**

Google Maps 8570 S Chicago Rd

Google Maps 8570 S Chicago Rd

March 2, 2017

Tiffany Ziemer	PHMSA	tiffany.ziemer@dot.gov
Ted Turner	PHMSA	ted.turner@dot.gov
Pete Wood	WDNR	Peter.Wood@wisconsin.gov
Curt Nickels	WDNR	Curtis.Nickels@wisconsin.gov
Eric Amadi	WDNR	eric.amadi@wisconsin.gov
James Entzminger	US EPA	entzminger.james@epa.gov
Mike Griffin	WDNR	mike.griffin@wi.gov
~~Ted Turner~~		
Brenda Whitney	U.S. EPA	whitney.brenda@epa.gov
Cathy Baerwald	WDNR	catherine.baerwald@wisconsin.gov
Scott Bush	Greif	Scott.bush@greif.com
~~Linda~~ Benfield	Foley	lbenfield@foley.com
Sarah Slack	Foley	SSlack@Foley.com
Mike Higgins	MASD	mhiggins@masdinc.com
STEELE JOHNS	GREIF	steele.johns@GREIF.COM
IAN BOYLE	GREIF	ian.boyle@greif.com
KEVIN MEYER	MASD	K.Meyer@masdinc.com
Kathy Halbur	EPA	halbur.kathy@epa.gov

NOTICE OF INSPECTION

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Emergency Planning and Community Right-to-Know Act of 1986 (EPCRA) and the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME
DATE	INSPECTOR NO.	DAILY SEQ. NO.		
3/2/17			9:50AM	Mid-America Steel Drum

4. INSPECTOR ADDRESS	5. FIRM ADDRESS
United States Environmental Protection Agency Region 5 77 West Jackson Boulevard Chicago, Illinois 60604	8570 South Chicago Road Oak Creek, WI 53154

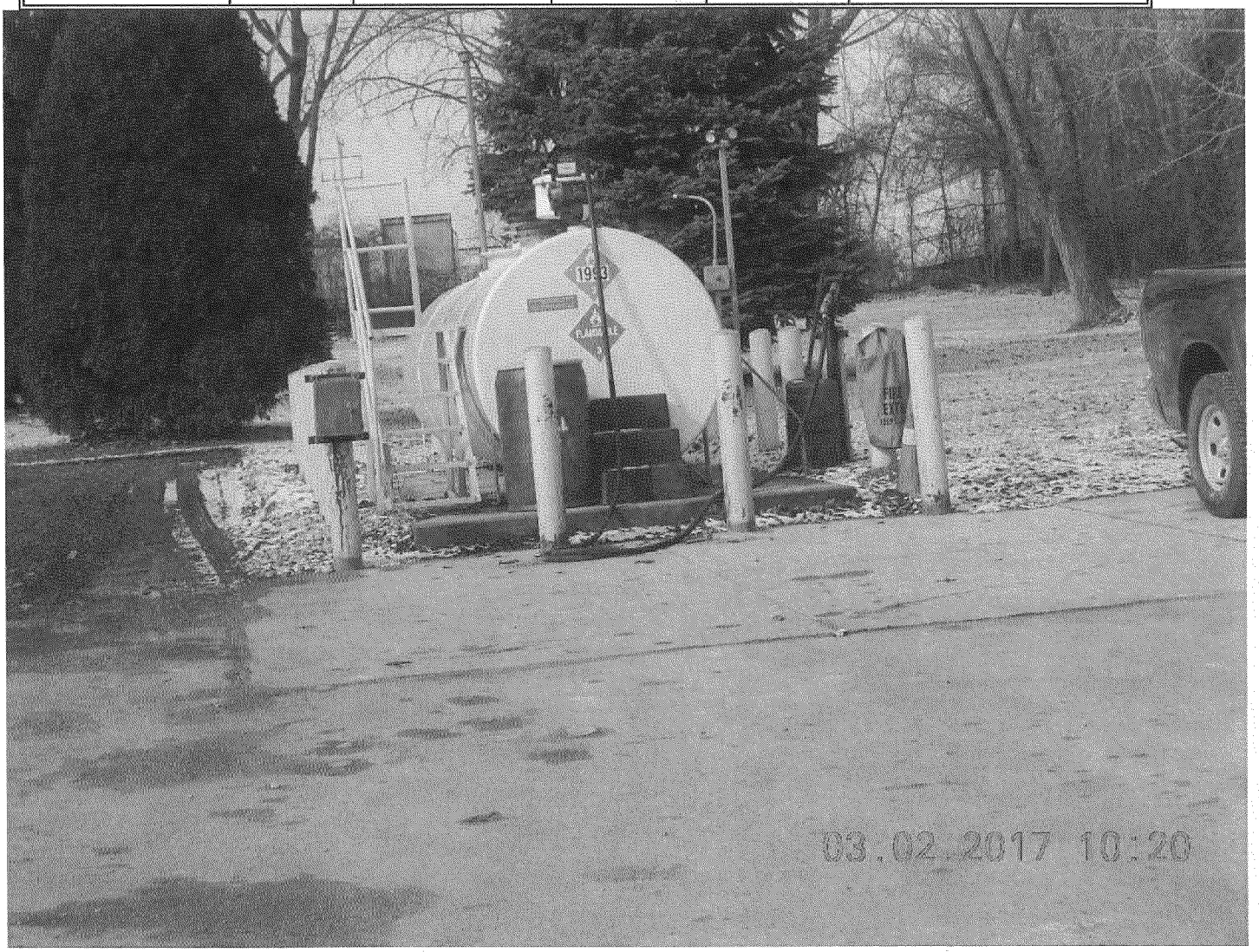
REASON FOR INSPECTION: This inspection is for the purpose of determining compliance with the Emergency Planning and Community Right-to-Know Act of 1986 and Section 103 of the Comprehensive Environmental Response, Compensation and Liability Act as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA). The scope of this inspection may include, but is not limited to: reviewing and obtaining copies of documents and records; interviews and taking of statements; reviewing of chemical manufacturing, importing, processing, and/or use facilities, including waste handling and treatment operations; taking samples and photographs; and any other inspection activities necessary to determine compliance with the Act.

INSPECTOR SIGNATURE		RECIPIENT SIGNATURE	
James Entzminger		Linda Benfield	
NAME		NAME	
James Entzminger		Linda Benfield	
TITLE	DATE SIGNED	TITLE	DATE SIGNED
EPS	3/2/17	Attorney	3/2/17

PHOTO LOG: Facility Mid-America Steel Drum Company City Oak Creek State Wisconsin Inspector James Entzminger
Attachment 4

Picture #	Date	Time picture taken	Object being photographed	Position from where photo was taken	Specific place at facility where photo was taken	Name of person taking the picture	Names of witnesses present when photos were taken	Thumbnail
1	March 2, 2017	10:20 am	Above Ground Diesel Fuel Tank	West	Mid-America Steel Drum Company, Oak Creek, Wisconsin	James Entzminger		
2	March 2, 2017	10:26 am	55-Gallon Drums in Maintenance Garage	West	Mid-America Steel Drum Company, Oak Creek, Wisconsin	James Entzminger		
3								
4								
5								
6								
7								
8								

ATTACHMENT # 4 PHOTOGRAPHS					
SUBJECT: Above Ground Diesel Fuel Tank					
FACILITY: Mid-America Steel Drum Company, Oak Creek, Wisconsin					
PHOTOGRAPHER **James Entzminger**			**WITNESSES**		
DATE **March 2, 2017**	**TIME** **10:20 am**	**DIRECTION** **West**	**CAMERA** **Nikon**	**FILM** **Digital**	**PHOTOGRAPH NO.** **1**



ATTACHMENT # 4 PHOTOGRAPHS					
SUBJECT: 55-Gallon Drums in Maintenance Garage					
FACILITY: Mid-America Steel Drum Company, Oak Creek, Wisconsin					
PHOTOGRAPHER James Entzminger			WITNESSES		
DATE March 2, 2017	TIME 10:26 am	DIRECTION West	CAMERA Nikon	FILM Digital	PHOTOGRAPH NO. 2

PHOTO LOG: Facility_____ City_____ State__ Inspector_____

Picture #	Date	Time picture taken	Object being photographed	Position from where photo was taken	Specific place at facility where photo was taken	Name of person taking the picture	Names of witnesses present when photos were taken	Thumbnail
1			Diesel Tank	West				
2			Oil Tanks	West				
3								
4								
5								
6								
7								
8								
9								

Entzminger, James

From: ABeggs@foley.com
Sent: Wednesday, July 12, 2017 11:03 AM
To: Entzminger, James
Cc: lbenfield@foley.com
Subject: Response to Request for Information
Attachments: fuel tank drawing.pdf

Mr. Entzminger,

As discussed, please find attached drawings of the diesel fuel tank located at the Oak Creek, Wisconsin Container Life Cycle Management LLC ("CLCM") facility.

The facility has confirmed that the tank is an aboveground double-walled tank and has a capacity of 4,000 gallons. The tank was installed in approximately 1999.

Please let me know if you have any questions or if you need anything further.

Best,

Amanda

Amanda K. Beggs

Foley & Lardner LLP
777 East Wisconsin Avenue
Milwaukee, WI 53202-5306
P 414.319.7037

Visit Foley.com

FOLEY
FOLEY & LARDNER LLP

American Petroleum

February 23, 1998

Mid-America Steel Drum Company
8570 S. Chicago Rd.
Oak Creek, WI 53154
Attn: Scott Swosinski

Dear Scott,

At your request we are pleased to submit the following:

One (1) 4000 gallon diesel fuel system. System will consist of a double-wall, UL-labeled tank 7' dia. X 14' long, two (2) emergency vents, atmospheric vent, clock gauge with alarm and overspill bowl. We will include a Fillrite Model 701 electric pump (with a capacity of 12 to 18 G.P.M.), automatic shut-off nozzle, hose breakaway and a remote, hip-level nozzle cradle. (For comparison purposes, service station pumps run approximately 5 G.P.M.)

Price: $ 12,755.00

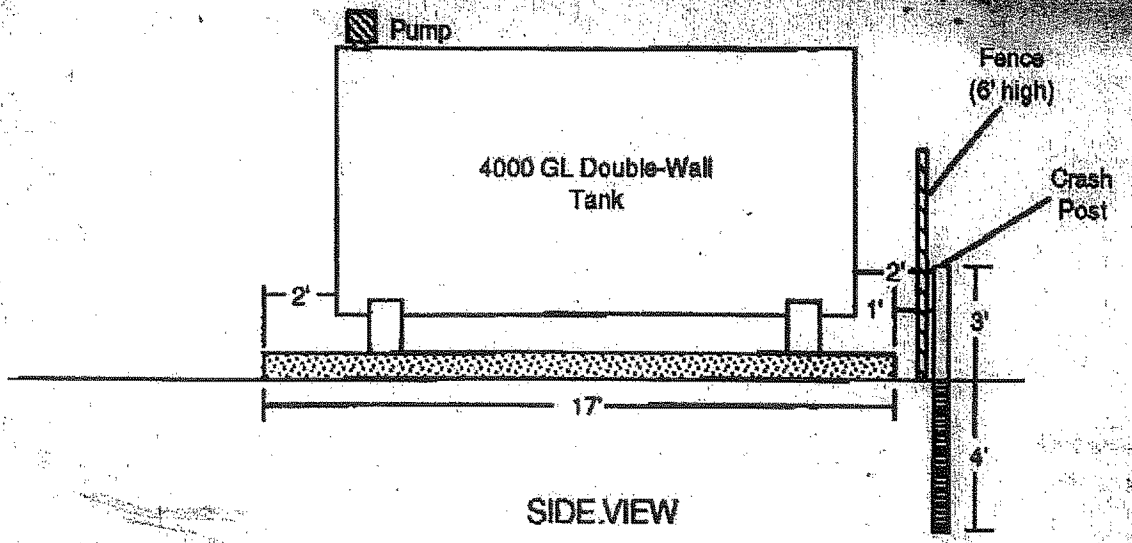
Please Note: This quotation is valid for 45 days from above date. In the event any additional local permit fees (beyond those in state code) are required they will be added to the above price. Pricing for above does not include electrical work, crash protection, equipment to unload the tank or State of Wisconsin sales tax.

TERMS: A 25% down payment is required at time of order with balance due on completion of the job.

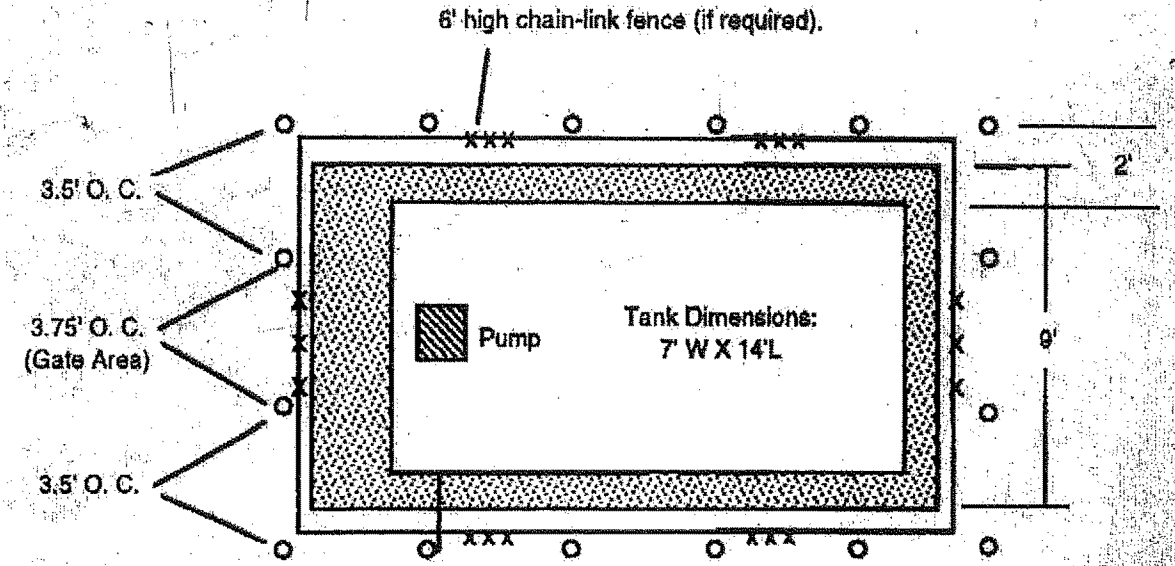
We look forward to working with you. If you have any questions please call.

Sincerely,

Kevin Bertelson
American Petroleum



SIDE VIEW



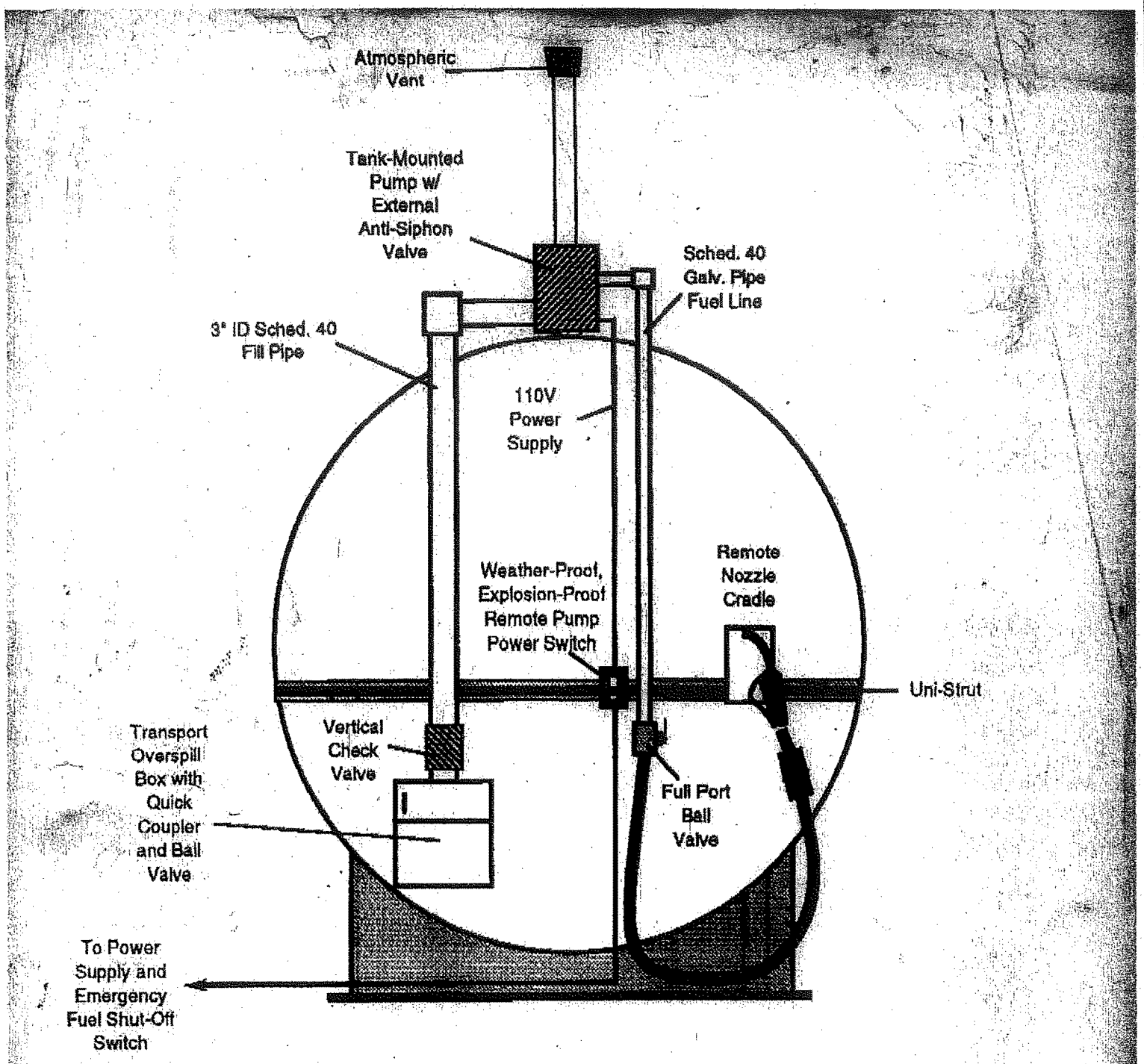
TOP VIEW

Crash Posts:
All four corners plus full perimeter at minimum 4' O.C. or less. At inspector's discretion may be deleted along a side if no vehicular traffic is possible.

Size:
Minimum 4" I.D. cement-filled posts. Recommend 7' length, buried 4', exposing 3'. Posts to be 2' from tank.

Pad Specifications:
Minimum size: 9' X 16' X 8" thick with wire mesh. Recommend size of 9' X 17' (shown above) for expanded pump service area

Fencing:
Non-flammable (chain-link) 6' high with lockable gate. Fence placed within the crash protection.



PIPING DETAIL FOR:
Mid-America Steel Drum
8570 S. Chicago Rd.
Oak Creek, WI 53154

PREPARED BY:
American Petroleum
1302 Scott Drive
Racine, WI 53406

NOT TO SCALE

EMERGENCY PLANNING NOTIFICATION

PO Box 7978, Madison, WI 53707-7978
Phone: 608-242-3221

WISCONSIN EMERGENCY MANAGEMENT
Wis. Stat Section 323.60-61, DMA 1003 (R11-09)

☑ Original ☐ Amended

Facility Identification

ID	:	78526			
Name	:	MID-AMERICA STEEL DRUM CO., INC.			
Street	:	8570 SOUTH CHICAGO ROAD	City	:	OAK CREEK
State	:	WI	Zip	:	53154
County	:	MILWAUKEE COUNTY			
LEPC Name	:	Milwaukee County LEPC	Tribe	:	☐
Lat/Long	:	42.8881604/-87.8624821	Fire Department	:	OAK CREEK FIRE DEPT
Contact Name	:	Scott Swosinski	Phone	:	(414) 762-1114
Fax	:	(414) 762-1623	Email	:	sswosinski@midamericasteeldrum.com
Maximum Occupants	:		☑ Unmanned	☐ Manned	

SIC Code	: 3412	Dun & Brad No	:	
NAICS	: 332439	TRIFID	:	

Subject to Emergency Planning under Section 302 of EPCRA (40 CFR part 355)? ☐ Yes ☑ No

Subject to Chemical Accident Prevention under Section 112(r) of CAA (40 CFR part 68, Risk Management Program)? RMP Facility ID : ☐ Yes ☑ No

Subject to Toxic Release Inventory under Section 313 of EPCRA (40 CFR part 372)? TRI Facility ID : ☐ Yes ☑ No

Owner/Operator Details

Name	: THOMAS J. HIGGINS			
Address	: 8570 SOUTH CHICAGO ROAD OAK CREEK, WI 53154 United States			
Phone	: (414) 762-1114	Email	:	

Parent Company Details

Name	:			
Address	: ,			
Phone	:	Email	:	
Dun and Brad No	:			

Facility Emergency Coordinator

Name	:	Title	:	
Phone	:	24 Hr. Phone	:	
Email	:			

Mailing Address if different from Facility ID Address

Company	: MID-AMERICA STEEL DRUM CO., INC.	Attn	:	SCOTT SWOSINSKI
Street Address 1	: 8570 SOUTH CHICAGO ROAD	Street Address 2	:	
City	: OAK CREEK	State	:	WI
Zip	: 53154	Phone	:	(414) 762-1114
Country	: United States			

Tier II Information Contact

Name	:	Title	:	
Phone	:	24 Hr. Phone	:	
Email	:			

Emergency Contacts

Sl.No	Name	Title	Phone	24 Hr.Phone	Email
1	SCOTT SWOSINKSI	VP General Manager	(414) 762-1114	(414) 304-1314	
2	KEVIN MEYER	Plant Manager	(414) 762-1114	(262) 785-9007	

Certification: I certify under penalty of law that I have personally examined and am familiar with the information submitted, and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Not Available, Not Available (Not) Ava-ilab xle- Not Available

Name and official title of owner/operator or authorized representative | Date | Telephone Number | Signature

EMERGENCY PLANNING NOTIFICATION

Facility Name : MID-AMERICA STEEL DRUM CO., INC. ID : 78526

Facility has EHS present at/above TPQ :

- ☐ No. Facility has never had an EHS present at or above TPQ
- ☐ No. Facility no longer exceeded EHS more than TPQ after
- ☑ Yes.

Facility Emergency Coordinator

Name :

Phone :

Fee Exemption ☐ Exempt ☐ Not Exempt

Reason for Fee Exemption

- ☐ a. The operator of this facility had fewer than 10 full-time equivalent employees (20,080 hrs.) in the state of Wisconsin in 1994.
- ☐ b. This is a Federal or federally recognized Tribal facility.

EMERGENCY PLANNING NOTIFICATION

Facility Name : MID-AMERICA STEEL DRUM CO., INC. ID : 78526

CAS	EHS Name	EHS Quantity	TPQ Value	Threshold Exceed Date	Chemical Name
7664939	SULFURIC ACID	1500	1,000		SULFURIC ACID

Notes	
Notes entered by Company/Facility User	Re: Mid-America Steel Drum Co, Inc., FID #78526, no longer has sulfuric acid on site nor any other hazardous materials in a reportable quantity and, therefore, will not be submitting a report this year. The last day it had sulfuric acid on site was 6/1/2015. Richard Janard 1/26/16
Notes entered by Administrator	TIER II MANAGER Data Migration Dec 2010 - Chemical Notes - PLAN VOLUME=1570#
Notes entered by Planner/Responder User	

WISCONSIN 2015 EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

PO Box 7978, Madison, WI 53707-7978
Phone: 608-242-3221

WISCONSIN EMERGENCY MANAGEMENT
DMA 1004 (R11-09) Wis. Stat 323.60

Reporting Period From January 1, 2015 to December 31, 2015

☑ Annual ☐ Revision ☐ Facility Information is changed from Last Submission

Facility Identification

ID	:	78526			
Name	:	MID-AMERICA STEEL DRUM CO., INC.			
Street	:	8570 SOUTH CHICAGO ROAD	City	:	OAK CREEK
State	:	WI	Zip	:	53154
County	:	MILWAUKEE COUNTY			
LEPC Name	:	Milwaukee County LEPC	Tribe	:	☐
Lat/Long	:	42.8881604/-87.8624821	Fire Department	:	OAK CREEK FIRE DEPT
Contact Name	:	Scott Swosinski	Phone	:	(414) 762-1114
Fax	:	(414) 762-1623	Email	:	sswosinski@midamericasteeldrum.com
Maximum Occupants	:	70	☑ Manned	☐ Unmanned	

SIC Code	:	3412	Dun & Brad No	:	NA
NAICS	:	332439	TRIFID	:	53154MDMRC8570S

Subject to Emergency Planning under Section 302 of EPCRA (40 CFR part 355)? ☑ Yes ☐ No

Subject to Chemical Accident Prevention under Section 112(r) of CAA (40 CFR part 68, Risk Management Program)? RMP Facility ID : ☐ Yes ☑ No

Subject to Toxic Release Inventory under Section 313 of EPCRA (40 CFR part 372)? TRI Facility ID : 53154MDMRC8570S ☑ Yes ☐ No

Owner/Operator Details

Name	:	MID AMERICA STEEL DRUM CO. INC.			
Address	:	8570 SOUTH CHICAGO ROAD OAK CREEK, WI 53154 United States			
Phone	:	(414) 762-1114	Email	:	SSWOSINSKI@MASDINC.COM

Parent Company Details

Name	:	MID-AMERICA STEEL DRUM CO., INC.			
Address	:	8570 SOUTH CHICAGO ROAD OAK CREEK, WI 53154 United States			
Phone	:	(414) 762-1114	Email	:	sswosinski@midamericasteeldrum.com
Dun and Brad No	:	NA			

Facility Emergency Coordinator

Name	:	SCOTT SWOSINSKI	Title	:	VP GENERAL MANAGER
Phone	:	(414) 762-1114	24 Hr. Phone	:	(414) 304-1314
Email	:	SSWOSINSKI@MASDINC.COM			

Mailing Address if different from Facility ID Address

Company	:	MID-AMERICA STEEL DRUM CO., INC.	Attn	:	SCOTT SWOSINSKI
Street Address 1	:	8570 SOUTH CHICAGO ROAD	Street Address 2	:	
City	:	OAK CREEK	State	:	WI
Zip	:	53154	Phone	:	(414) 762-1114
Country	:	United States			

Tier II Information Contact

Name	:	KEVIN MEYER	Title	:	PLANT MANAGER
Phone	:	(414) 762-1114	24 Hr. Phone	:	(262) 785-9007
Email	:	KMEYER@MASDINC.COM			

Emergency Contacts

Sl.No	Name	Title	Phone	24 Hr.Phone	Email
1	SCOTT SWOSINKSI	VP GENERAL MANAGER	(414) 762-1114	(414) 304-1314	SWOSINSKI@MASDINC.COM
2	KEVIN MEYER	PLANT MANAGER	(414) 762-1114	(262) 785-9007	KMEYER@MASDINC.COM

Certification: I certify under penalty of law that I have personally examined and am familiar with the information submitted, and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Richard Lyle, Janard, Inc.	1/19/2016 1:36 PM	(414) 303-4712	Richard Lyle
Name and official title of owner/operator or authorized representative	Date	Telephone Number	Signature

Optional Attachments

☑ Site Plan
☐ Site Coordinate Abbreviations
☐ Other Safeguard measures

WISCONSIN 2015 EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Facility Name : MID-AMERICA STEEL DRUM CO., INC. ID : 78526

Reporting Period From January 1, 2015 to December 31, 2015

Reporting Exemption ☐ Exempt ☑ Not Exempt

Reason for Reporting Exemption (See Resources for definitions of Fee/Reporting Exemptions)

- ☐ a. This facility is not covered by the OSHA Hazard Communication Act and is not a private or public agency as defined by s. 323.60 (1)(h) and (i).
- ☐ b. Per OSHA Hazard Communication Act regulations, hazardous chemicals present at this facility are not required to have Material Safety Data Sheets prepared for them or available to the facility because of one or more of the eight reporting exemptions at CFR Chapter 29, Section 1910.1200(b). (See Resources link for eight OSHA Reporting Exemptions)
- ☐ c. Hazardous chemicals at this facility fall under one or more of the section 311(e) reporting exemptions. (See Resources for five 311(e) Reporting Exemptions)
- ☐ d. This is a Retail Gas Station and the higher reporting thresholds for gasoline and diesel fuel apply. (See instructions in the Resources link)

Fee Exemption ☐ Exempt ☑ Not Exempt

Reason for Fee Exemption

- ☐ a. The operator of this facility had fewer than 10 full-time equivalent employees (20,080 hrs.) in the state of Wisconsin in 2015. There were a Total of 70 full-time equivalent employees.
- ☐ b. This is a Federal or federally recognized Tribal facility.

Partial Fee Exemption ☐ Exempt ☑ Not Exempt

Reason for Partial Fee Exemption (See Resources for definitions of Fee/Reporting Exemptions)

- ☐ a. Chemical is gasoline and/or diesel fuel present in reportable quantities and held for resale or retail at a petroleum marketing facility.
- ☐ b. Chemical is gasoline and/or diesel fuel at a retail gas station was stored in a tank(s) entirely underground, and 2) the facility was in compliance with all appticable Underground Storage program requirements at all times during the preceding calendar year, and 3) less than 75,000 gallons of gasoline and/or 100,000 gallons of diesel fuel were present any one time.
- ☐ c. Chemical is sand and/or gravel present in reportable quantities.
- ☐ d. Chemical is calcium chloride, sodium chloride and/or calcium magnesium acetate present in reportable quantities and used as a road deicing agent.
- ☐ e. Chemical is reported voluntarily and is not present in reportable quantities or exempt from reporting for Section 311(e) (MSDS/Chemical List), Section 312 (annual Tier Two Reporting), and the OSHA Hazard Communications Act regulations.

WISCONSIN 2015 EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Facility Name : MID-AMERICA STEEL DRUM CO., INC. ID : 78526

Reporting Period From January 1, 2015 to December 31, 2015

Chemical Description

Chemical ID : 11913
Chemical Information is changed from Last Submission : ☐
CAS : 7664939
Trade Secret : ☐
Chemical Name : SULFURIC ACID
EHS : ☑ Contains EHS : ☐
EHS Name : SULFURIC ACID
☑ Pure ☐ Mix ☐ Solid ☑ Liquid ☐ Gas

Physical & Health Hazards

- ☐ Fire
- ☐ Pressure
- ☑ Reactivity
- ☑ Immediate
- ☑ Delayed (Chronic)

Inventory

1500	Max Daily Amt(lbs)
04	Max Daily Amount Code
800	Ave. Daily Amount (lbs.)
03	Ave. Daily Amount Code
365	No of days on site

Storage Codes & Location

Container Type	Pressure	Temperature	Storage Location	Description	Max Amt At Location(lbs)
[E] Plastic or nonmetallic drum	[1] Ambient pressure	[4] Ambient temperature	STORAGE AREA AND WASTEWATER TREATMENT		1500

Fee and/or Reporting Exemption

- ☐ Chemical is gasoline or diesel fuel, held for resale or retail.
- ☐ Chemical is gasoline and/or diesel fuel was stored in a tank(s) entirely underground.
- ☐ Chemical is sand and/or gravel.
- ☐ Chemical is calcium chloride, sodium chloride or calcium magnesium acetate used for deicing agent.
- ☐ Chemical is reported voluntarily.

Notes	
Notes entered by Company/Facility User	Re: Mid-America Steel Drum Co, Inc., FID #78526, no longer has sulfuric acid on site nor any other hazardous materials in a reportable quantity and, therefore, will not be submitting a report this year. The last day it had sulfuric acid on site was 6/1/2015. Richard Janard 1/26/16
Notes entered by Administrator	TIER II MANAGER Data Migration Dec 2010 - Chemical Notes - PLAN VOLUME=1570#
Notes entered by Planner/Responder User	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 14 2017

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Linda E. Benfield
Attorney
Foley & Lardner, LLP
777 East Wisconsin Avenue
Milwaukee, Wisconsin 53202-5306

Re: Request for Information Regarding EPCRA Sections 311 and 312 for the Mid-America Steel Drum Company Facility, in Oak Creek, Wisconsin

Dear Ms. Benfield:

The U.S. Environmental Protection Agency is currently investigating your client's compliance with Sections 311 and 312 of the Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986, 42 U.S.C. §§ 11021 and 11022. A facility is subject to the requirements of Sections 311 and 312 if the owner/operator is required to prepare or have available a Material Safety Data Sheet (MSDS) for a hazardous chemical under the Occupational Safety and Health Act (OSHA) of 1970 and if the hazardous chemical is present in an amount in excess of the threshold established for such chemical.

The reporting requirement covers all hazardous chemicals present at the facility at any one time in amounts equal to or greater than 10,000 pounds, and for all extremely hazardous chemicals present at the facility in an amount greater than or equal to 500 pounds or the threshold planning quantity, whichever is lower.

You are hereby requested to respond to the Information Request enclosed within 20 days of receipt of this letter. Please be advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal fines or up to five years of imprisonment or both under 18 U.S.C. § 1001.

EPA has the authority to use the information requested herein in an administrative, civil, or criminal action. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1995, 44 U.S.C. § 3501, et seq.

Attachment 7

Your response to this Information Request should be mailed to:

James Entzminger
U.S. Environmental Protection Agency
Chemical Emergency Preparedness
and Prevention Section (SC-5J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Please direct any questions you may have regarding this Information Request to James Entzminger at (312) 886-4062.

EPA strongly encourages you to give this matter your immediate attention and to respond to this Information Request within the time specified above.

Thank you for your cooperation in this matter.

Sincerely,

Silvia Paloma for mtl

Michael E. Hans, Chief
Chemical Emergency Preparedness
and Prevention Section

Enclosures (3):
1. Information Request Definitions
2. Information Request Instructions
3. Information Request

DEFINITIONS

For the purpose of the Instructions and the Information Request set forth herein, the following definitions shall apply:

1. The terms "you" or "Respondent" shall mean the organization or entity identified in the cover letter, and its officers, managers, employees, contractors, trustees and agents.

2. The term "person" as used herein, in the plural as well as the singular, shall mean any natural person, firm, contractor, corporation, partnership, trust or governmental entity, unless the context indicates otherwise.

3. "And" as well as "or" shall be construed either conjunctively or disjunctively as necessary to bring within the scope of this Information Request all information which might otherwise be construed to be outside their scope.

4. The terms "furnish," "describe," or "indicate" shall mean turning over to the EPA either original or duplicate copies of the requested information in the possession, custody, or control of the Respondent. Where specific information has not been memorialized in any document but is nonetheless responsive to a request, you must respond to the request with a written response. If such requested information is not in your possession, custody, or control then indicate where such information or documents may be obtained.

5. "Release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles) of any hazardous chemical, extremely hazardous chemical, or toxic chemical.

6. The term "hazardous chemical" shall have the same definition as that contained in Section 1910.1200(c) of Title 29 of the Code of Federal Regulations except that such term does not include the following:

   a) Any food, food additive, color additive, drug, or cosmetic regulated by the Food and Drug Administration.

   b) Any chemical present as a solid in any manufactured item to the extent exposure to the substance does not occur under normal conditions of use.

   c) Any chemical to the extent it is used for personal, family, or household purposes, or is present in the same form and concentration as a product packaged for distribution and use by the general public.

   d) Any chemical to the extent it is used in a research laboratory or a hospital or other medical facility under the direct supervision of a technically qualified individual.

e) Any chemical to the extent it is used in routine agricultural operations or is a fertilizer held for sale by a retailer to the ultimate customer.

7. The term "extremely hazardous chemical" means a chemical on the list contained in Section 302(a)(2) of EPCRA.

8. The term "toxic chemical" means a chemical on the list described in Section 313(c) of EPCRA.

9. The term "environment" includes water, air, and land and the interrelationships which exist among and between water, air, and land and all living things.

10. The terms "transport" or "transportation" mean the movement of a hazardous chemical by any mode, including pipeline, and in the case of a hazardous chemical which has been accepted for transportation by a common or contract carrier, the terms "transport" or "transportation" shall include any stoppage in transit which is temporary, incidental to the transportation movement, and at the ordinary operating convenience of a common or contract carrier, and any such stoppage shall be considered as a continuity of movement and not as the storage of a hazardous chemical.

11. The term "facility" means all buildings, equipment, structures, and other stationary items which are located on a single or on contiguous or adjacent sites and which are owned or operated by the same person (or by a person who controls, is controlled by, or is under common control with such person).

12. The term "material safety data sheet (MSDS)" means the sheet required to be developed under Section 1910.1200(g) of Title 29 of the Code of Federal Regulations, as that section may be amended from time to time.

13. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. §§ 9601-9675, the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §§ 6901-6991; 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

INSTRUCTIONS

1. A separate response must be made to each of the questions set forth in this Information Request.

2. Precede each answer with the number in the Information Request to which it corresponds.

3. In answering each request, identify all contributing sources of information.

4. If information not known or not available to the Respondent as of the date of submission of its response should later become known or available, Respondent must supplement its response to EPA. Moreover, should the Respondent find, at any time after the submission of its response that any portion of the submitted information is false or misrepresents the truth, Respondent must notify EPA as soon as possible.

5. You must submit all required information under an authorized signature with the following certification:

   I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete.

6. The information requested herein must be provided notwithstanding its possible characterization as confidential information or trade secrets. You may, if you desire, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. You should read carefully the above-cited regulations before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

INFORMATION REQUEST

1. Identify all persons consulted in the preparation of the answers to this request.

2. Identify all documentation consulted, examined, or referred to in the preparation of the answers to this request and provide copies of all such documents.

3. What is Mid-America Steel Drum Company (Mid-America)'s Standard Industrial Classification Code?

4. What is Mid-America's Dun & Bradstreet number?

5. What are Mid-America's annual sales for the most recently completed fiscal year?

6. How many employees are employed at Mid-America, Oak Creek, Wisconsin?

7. How many employees are employed at Mid-America corporate wide?

8. Is Mid-America a RCRA facility? If so, provide the EPA Identification Number.

9. Provide a copy of your emergency plan which outlines the procedures for notification of accidental releases at your facility.

10. Provide documentation regarding the training of your employees on the procedures for notification of accidental releases at your facility.

11. Provide the name and current address of the owner(s) of the property located at 8570 South Chicago Road, Oak Creek, Wisconsin, during the time period of January 1, 2013, to the present.

12. Provide the name and current address of the operator(s) of the facility located at 8570 South Chicago road, Oak Creek, Wisconsin, during the time period of January 1, 2013, to the present.

13. When did Mid-America began operations in Oak Creek, Wisconsin?

14. If Mid-America was a corporation during the time period of January 1, 2013, to the present, provide a copy of the Articles of Incorporation.

15. If Mid-America was a subsidiary of a corporation during the time period of January 1, 2013, to the present, identify the parent corporation and provide copies of pertinent documents supporting the subsidiary relationship.

16. If Mid-America was a division of a corporation during the time period of January 1, 2013, to the present, identify the corporation and provide copies of pertinent documents supporting the claim that this company is a corporate division.

17. If Mid-America was a partnership during the time period of January 1, 2013, to the present, provide a copy of the partnership agreement.

18. If Mid-America was a trust during the time period of January 1, 2013, to the present, provide all relevant agreements and documents to support this claim.

19. Did Mid-America supply copies of all Material Safety Data Sheets (MSDSs), or a list of hazardous chemicals, for materials stored at this facility above a Threshold Planning Quantity (TPQ) and/or Reporting Threshold to the Wisconsin State Emergency Response Commission on or before October 17, 1987, or 90 days from the date the hazardous chemical became present at this facility? If so, provide documentation to support your claim.

20. Did Mid-America supply copies of all MSDSs, or a list of hazardous chemicals, for materials stored at this facility above a TPQ and/or Reporting Threshold to the Milwaukee County Local Emergency Planning Committee on or before October 17, 1987, or 90 days from the date the hazardous chemicals became present at this facility? If so, provide documentation to support your claim.

21. Did Mid-America supply copies of all MSDSs, or a list of hazardous chemicals, for materials stored at this facility above a TPQ and/or Reporting Threshold to the Oak Creek Fire Department on or before October 17, 1987, or 90 days from the date the hazardous chemical became present at this facility? If so, provide documentation to support your claim.

22. Was Mid-America conducting business at 8570 South Chicago Road, Oak Creek, Wisconsin, during the time period of January 1, 2013, to December 31, 2013? If so, please respond to the following information requests:

    a) Did Mid-America use, produce, manufacture, and/or store any hazardous chemicals at this location during the period of January 1, 2013, to December 31, 2013?

    b) If Mid-America did use, produce, manufacture, and/or store any hazardous chemicals at this location, provide a list of such hazardous chemicals and the maximum quantity stored at this facility at any one given time during the period of January 1, 2013, to December 31, 2013.

    c) For each hazardous chemical listed in number 22(b), provide an MSDS.

d) Provide a copy of the Tier One or Tier Two form required under Section 312 of EPCRA, 42 U.S.C. § 11022, for the period of January 1, 2013, to December 31, 2013.

e) Did Mid-America supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Wisconsin State Emergency Response Commission for the period of January 1, 2013, to December 31, 2013, on or before March 1, 2014? If so, provide documentation to support your claim.

f) Did Mid-America supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Milwaukee County Local Emergency Planning Committee for the period of January 1, 2013, to December 31, 2013, on or before March 1, 2014? If so, provide documentation to support your claim.

g) Did Mid-America supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Oak Creek Fire Department for the period of January 1, 2013, to December 31, 2013, on or before March 1, 2014? If so, provide documentation to support your claim.

23. Was Mid-America conducting business at 8570 South Chicago Road, Oak Creek, Wisconsin, during the time period of January 1, 2014, to December 31, 2014? If so, please respond to the following information requests:

a) Did Mid-America use, produce, manufacture, and/or store any hazardous chemicals at this location during the period of January 1, 2014, to December 31, 2014?

b) If Mid-America did use, produce, manufacture, and/or store any hazardous chemicals at this location, provide a list of such hazardous chemicals and the maximum quantity stored at this facility at any one given time during the period of January 1, 2014, to December 31, 2014.

c) For each hazardous chemical listed in number 23(b), provide an MSDS. If you already provided an MSDS for a hazardous chemical in information request number 22, you need not provide another one for the same hazardous chemical.

d) Provide a copy of the Tier One or Tier Two form required under Section 312 of EPCRA, 42 U.S.C. § 11022, for the period of January 1, 2014, to December 31, 2014.

e) Did Mid-America supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Wisconsin State Emergency Response Commission for the period of January 1, 2014, to December 31, 2014, on or before March 1, 2015? If so, provide documentation to support your claim.

f) Did Mid-America supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Milwaukee County Local Emergency Planning Committee for the period of January 1, 2014, to December 31, 2014, on or before March 1, 2015? If so, provide documentation to support your claim.

g) Did Mid-America supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Oak Creek Fire Department for the period of January 1, 2014, to December 31, 2014, on or before March 1, 2015? If so, provide documentation to support your claim.

24. Was Mid-America conducting business at 8570 South Chicago Road, Oak Creek, Wisconsin, during the time period of January 1, 2015, to December 31, 2015? If so, please respond to the following information requests:

a) Did Mid-America use, produce, manufacture, and/or store any hazardous chemicals at this location during the period of January 1, 2015, to December 31, 2015?

b) If Mid-America did use, produce, manufacture, and/or store any hazardous chemicals at this location, provide a list of such hazardous chemicals and the maximum quantity stored at this facility at any one given time during the period of January 1, 2015, to December 31, 2015.

c) For each hazardous chemical listed in number 24(b), provide an MSDS. If you already provided an MSDS in information request number 22 or 23, you need not provide another one for the same hazardous chemical.

d) Provide a copy of the Tier One or Tier Two form required under Section 312 of EPCRA, 42 U.S.C. § 11022, for the period of January 1, 2015, to December 31, 2015.

e) Did Mid-America supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Wisconsin State Emergency Response Commission for the period of January 1, 2015, to December 31, 2015, on or before March 1, 2016? If so, provide documentation to support your claim.

f) Did Mid-America supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Milwaukee County Local Emergency Planning Committee for the period of January 1, 2015, to December 31, 2015, on or before March 1, 2016? If so, provide documentation to support your claim.

g) Did Mid-America supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Oak Creek Fire Department for the period of January 1, 2015, to December 31, 2015, on or before March 1, 2016? If so, provide documentation to support your claim.

25. Was Mid-America conducting business at 8570 South Chicago Road, Oak Creek, Wisconsin, during the time period of January 1, 2016, to December 31, 2016? If so, please respond to the following information requests:

a) Did Mid-America use, produce, manufacture, and/or store any hazardous chemicals at this location during the period of January 1, 2016, to December 31, 2016?

b) If Mid-America did use, produce, manufacture, and/or store any hazardous chemicals at this location, provide a list of such hazardous chemicals and the maximum quantity stored at this facility at any one given time during the period of January 1, 2016, to December 31, 2016.

c) For each hazardous chemical listed in number 25(b), provide an MSDS. If you already provided an MSDS for a hazardous chemical in information request number 22, 23, or 24, you need not provide another one for the same hazardous chemical.

d) Provide a copy of the Tier One or Tier Two form required under Section 312 of EPCRA, 42 U.S.C. § 11022, for the period of January 1, 2016, to December 31, 2016.

e) Did Mid-America supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Wisconsin State Emergency Response Commission for the period of January 1, 2016, to December 31, 2016, on or before March 1, 2017? If so, provide documentation to support your claim.

f) Did Mid-America supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Milwaukee County Local Emergency Planning Committee for the period of January 1, 2016, to December 31, 2016, on or before March 1, 2017? If so, provide documentation to support your claim.

g) Did Mid-America supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Oak Creek Fire Department for the period of January 1, 2016, to December 31, 2016, on or before March 1, 2017? If so, provide documentation to support your claim.

FOLEY
FOLEY & LARDNER LLP

ATTORNEYS AT LAW
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CLIENT/MATTER NUMBER
110874-0103

June 8, 2017

Via E-Mail & FedEx

James Entzminger
United States Environmental Protection Agency
Chemical Emergency Preparedness and Prevention
Section (SC-5J)
77 West Jackson Boulevard
Chicago, IL 60604
Entzminger.James@epa.gov

Re: Response to Request to Provide Information Pursuant to Emergency Planning and Community Right-to-Know Act Dated April 14, 2017- Container Life Cycle Management LLC- Oak Creek facility
CONTAINS CONFIDENTIAL BUSINESS INFORMATION

Dear Mr. Entzminger:

On April 18, 2017, Foley & Lardner LLP received the United States Environmental Protection Agency's ("U.S. EPA") Emergency Planning and Community Right-to-Know Act, Sections 311 and 312 Information Request dated April 14, 2017 ("Information Request") directed to the "Mid-America Steel Drum Company Facility, in Oak Creek, Wisconsin" located at 8570 South Chicago Road, Oak Creek, Wisconsin. Providing responses to the Information Request required locating and reviewing a large volume of documents. CLCM appreciates U.S. EPA's flexibility in granting an extension of the deadline to fully respond to the Information Request to June 8, 2017.

Documents responsive to this request are provided as PDFs and Microsoft Excel files on the flash drive which will be arriving via FedEx, with a corresponding Table of Contents as requested. The PDFs have been scanned for viruses using Workshare Professional.

Sincerely,

Linda E. Benfield

Enclosures (via FedEx only)
c w/o enc: Kevin Meyer

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

RESPONSE OF
CONTAINER LIFE CYCLE MANAGEMENT LLC TO
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY'S
EPCRA SECTIONS 311 AND 312 INFORMATION REQUEST

CONTAINS CONFIDENTIAL BUSINESS INFORMATION

June 8, 2017

On April 18, 2017, Foley & Lardner LLP received the United States Environmental Protection Agency's ("U.S. EPA") Emergency Planning and Community Right-to-Know Act, Sections 311 and 312 Information Request dated April 14, 2017 ("Information Request") directed to the "Mid-America Steel Drum Company Facility, in Oak Creek, Wisconsin" located at 8570 South Chicago Road, Oak Creek, Wisconsin (the "CLCM Facility"). U.S. EPA granted an extension of time for CLCM to respond to the Information Request to June 8, 2017.

Container Life Cycle Management LLC ("CLCM") is a joint venture that purchased the operating assets of the business from Mid-America Steel Drum Co., Inc. on November 4, 2013, and currently operates the CLCM Facility. CLCM is responding to the Information Request as it applies to CLCM's operations; to the extent U.S. EPA requests information that predates CLCM's operations, CLCM can put U.S. EPA in contact with the previous owner of the facility.

GENERAL OBJECTIONS

CLCM's objections are made without in any way waiving or intending to waive but, on the contrary, preserving and intending to preserve:

(a) all questions and/or objections as to competency, relevancy, materiality, privilege, and admissibility as evidence for any purpose of the responses or subject matter thereof, in any subsequent proceeding involving CLCM;

(b) the right to object on any ground to the use of these responses or the subject matter thereof in any subsequent proceeding involving CLCM; and

(c) the right to object on any ground at any time to other requests or discovery procedures involving or relating to the subject of these responses.

These responses are based on, and therefore necessarily limited by, the records and information still in existence, presently recollected, and thus far discovered in the course of preparing these responses. CLCM reserves the right to supplement and make any changes to these responses if it appears at any time that omissions or errors have been made or that more accurate information is available.

CLCM objects to each and every instruction and request to the extent that it seeks information that is not relevant or otherwise beyond that authorized by the Emergency Planning and Community Right-to-Know Act.

CLCM objects to each and every instruction and request to the extent that it seeks information protected by the attorney/client privilege, the attorney work product doctrine, or any other applicable privilege or restriction, and CLCM has not included in this response copies of any such documents protected by such privileges, doctrines, or restrictions.

The following responses correspond to the numbered requests within the Information Request (the Information Request language is set forth in italics). All responses were prepared with the assistance and advice of counsel and such discussions are covered by attorney/client and attorney work product privileges.

RESPONSE

REQUEST NO. 1. *Identify all persons consulted in the preparation of the answers to this request.*

Response No. 1. Kevin Meyer, Geoff Westphal, Steele Johns, Ian Boyle, and Lauren Laabs of Mostardi Platt provided information used or considered in the responses to the Information Request or were otherwise consulted in the preparation of the responses to the Information Request.

REQUEST NO. 2. *Identify all documentation consulted, examined, or referred to in the preparation of the answers to this request and provide copies of all such documents.*

Response No. 2. To the extent documents were responsive to this Information Request, they have been provided with this Response.

REQUEST NO. 3. *What is Mid-America Steel Drum Company (Mid-America)'s Standard Industrial Classification Code?*

Response No. 3. The Standard Industrial Classification Code for the CLCM Facility is 7699 – Repair Shops and Related Services, Not Elsewhere Classified.

REQUEST NO. 4. *What is Mid-America's Dun & Bradstreet number?*

Response No. 4. The CLCM Facility's Dun & Bradstreet number is 04-130-7411.

REQUEST NO. 5. *What are Mid-America's annual sales for the most recently completed fiscal year?*

Response No. 5. CLCM's annual net sales for fiscal year 2016 were $51,148,000.

THE INFORMATION PROVIDED IN RESPONSE TO THIS REQUEST NO. 5 IS CONFIDENTIAL BUSINESS INFORMATION.

REQUEST NO. 6. *How many employees are employed at Mid-America, Oak Creek, Wisconsin?*

Response No. 6. The CLCM Oak Creek facility has 57 full time employees.

REQUEST NO. 7. *How many employees are employed at Mid-America corporate wide?*

Response No. 7. CLCM has 120 employees corporate wide.

REQUEST NO. 8. *Is Mid-America a RCRA facility? If so, provide the EPA Identification Number.*

Response No. 8. The CLCM Facility is classified as a Small Quantity Generator ("SQG") with an EPA ID of WID045953189.

REQUEST NO. 9. *Provide a copy of your emergency plan which outlines the procedures for notification of accidental releases at your facility.*

Response No. 9. A copy of the CLCM Facility's emergency plan is enclosed with this Response and labeled as document Bates No. CLCM-EPCRA-Oak Creek-Q9-000001 to CLCM-EPCRA-Oak Creek-Q9-000037.

REQUEST NO. 10. *Provide documentation regarding the training of your employees on the procedures for notification of accidental releases at your facility.*

Response No. 10. The sign-in sheet for the employee training regarding procedures for notification of accidental releases at the CLCM Facility is enclosed with this Response and labeled as document Bates No. CLCM-EPCRA-Oak Creek-Q10-000001.

REQUEST NO. 11. *Provide the name and current address of the owner(s) of the property located at 8570 South Chicago Road, Oak Creek, Wisconsin, during the time period of January 1, 2013, to the present.*

Response No. 11. CLCM purchased the operating assets at this location on November 4, 2013 and entered into an Agreement of Lease with Mid-America Steel Drum Properties, LLC on that date. To the extent U.S. EPA requests information that predates CLCM's operations, CLCM can put U.S. EPA in contact with the previous owner of the facility.

REQUEST NO. 12. *Provide the name and current address of the operator(s) of the facility located at 8570 South Chicago Road, Oak Creek, Wisconsin, during the time period of January 1, 2013, to the present.*

Response No. 12. CLCM has operated this location since November 4, 2013.

REQUEST NO. 13. *When did Mid-America began operations in Oak Creek, Wisconsin?*

Response No. 13. CLCM has operated this location since November 4, 2013. CLCM purchased the operating assets of the business from Mid-America Steel Drum Co., Inc. To the extent U.S. EPA requests information that predates CLCM's operations, CLCM can put U.S. EPA in contact with the previous owner of the facility.

REQUEST NO. 14. *If Mid-America was a corporation during the time period of January 1, 2013, to the present, provide a copy of the Articles of Incorporation.*

Response No. 14. CLCM is a limited liability company.

REQUEST NO. 15. *If Mid-America was a subsidiary of a corporation during the time period of January 1, 2013, to the present, identify the parent corporation and provide copies of pertinent documents supporting the subsidiary relationship.*

Response No. 15. CLCM is an indirect joint venture subsidiary of Greif, Inc.

REQUEST NO. 16. *If Mid-America was a division of a corporation during the time period of January 1, 2013, to the present, identify the corporation and provide copies of pertinent documents supporting the claim that this company is a corporate division.*

Response No. 16. Not applicable.

REQUEST NO. 17. *If Mid-America was a partnership during the time period of January 1, 2013, to the present, provide a copy of the partnership agreement.*

Response No. 17. Not applicable.

REQUEST NO. 18. *If Mid-America was a trust during the time period of January 1, 2013, to the present, provide all relevant agreements and documents to support this claim.*

Response No. 18. Not applicable.

REQUEST NO. 19. *Did Mid-America supply copies of all Material Safety Data Sheets (MSDSs), or a list of hazardous chemicals, for materials stored at this facility above a Threshold Planning Quantity (TPQ) and/or Reporting Threshold to the Wisconsin State Emergency Response Commission on or before October 17, 1987, or 90 days from the date the hazardous chemical became present at this facility? If so, provide documentation to support your claim.*

Response No. 19. Not applicable. Please see Response No. 11.

REQUEST NO. 20. *Did Mid-America supply copies of all MSDSs, or a list of hazardous chemicals, for materials stored at this facility above a TPQ and/or Reporting Threshold to the Milwaukee County Local Emergency Planning Committee on or before October 17, 1987, or 90 days from the date the hazardous chemicals became present at this facility? If so, provide documentation to support your claim.*

Response No. 20. Not applicable. Please see Response No. 11.

REQUEST NO. 21. *Did Mid-America supply copies of all MSDSs, or a list of hazardous chemicals, for materials stored at this facility above a TPQ and/or Reporting Threshold to the Oak Creek Fire Department on or before October 17, 1987, or 90 days from the date the hazardous chemical became present at this facility? If so, provide documentation to support your claim.*

Response No. 21. Not applicable. Please see Response No. 11.

REQUEST NO. 22. *Was Mid-America conducting business at 8570 South Chicago Road, Oak Creek, Wisconsin, during the time period of January 1, 2013, to December 31, 2013? If so, please respond to the following information requests:*

(a) *Did Mid-America use, produce, manufacture, and/or store any hazardous chemicals at this location during the period of January 1, 2013, to December 31, 2013?;*

(b) *If Mid-America did use, produce, manufacture, and/or store any hazardous chemicals at this location, provide a list of such hazardous chemicals and the maximum quantity stored at this facility at any one given time during the period of January 1, 2013, to December 31, 2013;*

(c) *For each hazardous chemical listed in number 22(b), provide an MSDS;*

(d) *Provide a copy of the Tier One or Tier Two form required under Section 312 of EPCRA, 42 U.S.C. § 11022, for the period of January 1, 2013, to December 31, 2013;*

(e) *Did Mid-America supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Wisconsin State Emergency Response Commission for the period of January 1, 2013, to*

December 31, 2013, on or before March 1, 2014? If so, provide documentation to support your claim;

(f) Did Mid-America supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Milwaukee County Local Emergency Planning Committee for the period of January 1, 2013, to December 31, 2013, on or before March 1, 2014? If so, provide documentation to support your claim;

(g) Did Mid-America supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Oak Creek Fire Department for the period of January 1, 2013, to December 31, 2013, on or before March 1, 2014? If so, provide documentation to support your claim.

Response No. 22. CLCM conducted business at 8570 South Chicago Road Oak Creek, Wisconsin, during the time period of November 4, 2013 to December 31, 2013.

(a) The CLCM Facility did use, produce, manufacture, and/or store hazardous chemicals at this location during the period of November 4, 2013 to December 31, 2013.

(b) The Tier 2 report which includes a list of the chemicals stored and the quantities stored that exceeded the reporting thresholds during the period of November 4, 2013 to December 31, 2013 is enclosed with this Response and labeled as document Bates No. CLCM-EPCRA-Oak Creek-Q22(b)-000001 to Bates No. CLCM-EPCRA-Oak Creek-Q22(b)-000005.

(c) The MSDS for the chemicals listed in 22(b) are enclosed with this Response and labeled as documents Bates No. CLCM-EPCRA-Oak Creek-Q22(c)-000001 to Bates No. CLCM-EPCRA-Oak Creek-Q22(c)-000007.

(d) Required forms for the period from November 4, 2013 to December 31, 2013 are enclosed with this Response and labeled as documents Bates No. CLCM-EPCRA-Oak Creek-Q22(d)-(g)-000001 to Bates No. CLCM-EPCRA-Oak Creek-Q22(d)-(g)-000005. The CLCM Facility is currently evaluating whether the CLCM Facility exceeded reporting thresholds for diesel fuel at any point in 2013, 2014 or 2015 or rock salt at any point in 2013, 2014, 2015, or 2016. The CLCM Facility will promptly submit the applicable reports, if the CLCM Facility determines that such reports were required.

(e) Copies of the forms provided in response to Request 22(d) were provided to Wisconsin Emergency Management, which is the State Emergency Response Commission, prior to March 1, 2014. Documentation responsive to this request is enclosed with this Response and labeled as

documents Bates No. CLCM-EPCRA-Oak Creek-Q22(d)-(g)-000001 to Bates No. CLCM-EPCRA-Oak Creek-Q22(d)-(g)-000005.

(f) Copies of the forms provided in response to Request 22(d) were made available to the Milwaukee County Local Emergency Planning Committee prior to March 1, 2014. Documentation responsive to this request is enclosed with this Response and labeled as documents Bates No. CLCM-EPCRA-Oak Creek-Q22(d)-(g)-000001 to Bates No. CLCM-EPCRA-Oak Creek-Q22(d)-(g)-000005.

(g) Copies of the forms provided in response to Request 22(d) were made available to the Oak Creek Fire Department prior to March 1, 2014. Documentation responsive to this request is enclosed with this Response and labeled as documents Bates No. CLCM-EPCRA-Oak Creek-Q22(d)-(g)-000001 to Bates No. CLCM-EPCRA-Oak Creek-Q22(d)-(g)-000005.

REQUEST NO. 23. *Was Mid-America conducting business at 8570 South Chicago Road, Oak Creek, Wisconsin, during the time period of January 1, 2014, to December 31, 2014? If so, please respond to the following information requests:*

(a) Did Mid-America use, produce, manufacture, and/or store any hazardous chemicals at this location during the period of January 1, 2014, to December 31, 2014?;

(b) If Mid-America did use, produce, manufacture, and/or store any hazardous chemicals at this location, provide a list of such hazardous chemicals and the maximum quantity stored at this facility at any one given time during the period of January 1, 2014, to December 31, 2014;

(c) For each hazardous chemical listed in number 23(b), provide an MSDS. If you already provided an MSDS for a hazardous chemical in information request number 22, you need not provide another one for the same hazardous chemical;

(d) Provide a copy of the Tier One or Tier Two form required under Section 312 of EPCRA, 42 U.S.C. § 11022, for the period of January 1, 2014, to December 31, 2014;

(e) Did Mid-America supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Wisconsin State Emergency Response Commission for the period of January 1, 2014, to December 31, 2014, on or before March 1, 2015? If so, provide documentation to support your claim;

(f) Did Mid-America supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Milwaukee County Local Emergency Planning Committee for the period of January 1, 2014,

to December 31, 2014, on or before March 1, 2015? If so, provide documentation to support your claim;

(g) *Did Mid-America supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Oak Creek Fire Department for the period of January 1, 2014, to December 31, 2014, on or before March 1, 2015? If so, provide documentation to support your claim.*

Response No. 23. CLCM conducted business at 8570 South Chicago Road Oak Creek, Wisconsin, during the time period of January 1, 2014 to December 31, 2014.

(a) The CLCM Facility did use, produce, manufacture, and/or store hazardous chemicals at this location during the period of January 1, 2014 to December 31, 2014.

(b) The Tier 2 report which includes a list of the chemicals stored and the quantities stored that exceeded the reporting thresholds during the period of January 1, 2014 to December 31, 2014 is enclosed with this Response and labeled as document Bates No. CLCM-EPCRA-Oak Creek-Q23(b)-000001 to Bates No. CLCM-EPCRA-Oak Creek-Q23(b)-000005.

(c) MSDS for the chemicals listed in 23(b) are enclosed with this Response and labeled as documents Bates No. CLCM-EPCRA-Oak Creek-Q23(c)-000001 to Bates No. CLCM-EPCRA-Oak Creek-Q23(c)-000007.

(d) Required forms for the period from January 1, 2014 to December 31, 2014 are enclosed with this Response and labeled as documents Bates No. CLCM-EPCRA-Oak Creek-Q23(d)-(g)-000001 to Bates No. CLCM-EPCRA-Oak Creek-Q23(d)-(g)-000005. The CLCM Facility is currently evaluating whether the CLCM Facility exceeded reporting thresholds for diesel fuel at any point in 2013, 2014 or 2015 or rock salt at any point in 2013, 2014, 2015, or 2016. The CLCM Facility will promptly submit the applicable reports, if the CLCM Facility determines that such reports were required.

(e) Copies of the forms provided in response to Request 23(d) were provided to Wisconsin Emergency Management, which is the State Emergency Response Commission, prior to March 1, 2015. Documentation responsive to this request is enclosed with this Response and labeled as documents Bates No. CLCM-EPCRA-Oak Creek-Q23(d)-(g)-000001 to Bates No. CLCM-EPCRA-Oak Creek-Q23(d)-(g)-000005.

(f) Copies of the forms provided in response to Request 23(d) were made available to the Milwaukee County Local Emergency Planning Committee prior to March 1, 2015. Documentation responsive to this request is enclosed with this Response and labeled as documents Bates No. CLCM-

EPCRA-Oak Creek-Q23(d)-(g)-000001 to Bates No. CLCM-EPCRA-Oak Creek-Q23(d)-(g)-000005.

(g) Copies of the forms provided in response to Request 23(d) were made available to the Oak Creek Fire Department prior to March 1, 2015. Documentation responsive to this request is enclosed with this Response and labeled as documents Bates No. CLCM-EPCRA-Oak Creek-Q23(d)-(g)-000001 to Bates No. CLCM-EPCRA-Oak Creek-Q23(d)-(g)-000005.

REQUEST NO. 24. *Was Mid-America conducting business at 8570 South Chicago Road, Oak Creek, Wisconsin, during the time period of January 1, 2015, to December 31, 2015? If so, please respond to the following information requests:*

(a) Did Mid-America use, produce, manufacture, and/or store any hazardous chemicals at this location during the period of January 1, 2015, to December 31, 2015?;

(b) If Mid-America did use, produce, manufacture, and/or store any hazardous chemicals at this location, provide a list of such hazardous chemicals and the maximum quantity stored at this facility at any one given time during the period of January 1, 2015, to December 31, 2015;

(c) For each hazardous chemical listed in number 24(b), provide an MSDS. If you already provided an MSDS in information request number 22 or 23, you need not provide another one for the same hazardous chemical;

(d) Provide a copy of the Tier One or Tier Two form required under Section 312 of EPCRA, 42 U.S.C. § 11022, for the period of January 1, 2015, to December 31, 2015;

(e) Did Mid-America supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Wisconsin State Emergency Response Commission for the period of January 1, 2015, to December 31, 2015, on or before March 1, 2016? If so, provide documentation to support your claim;

(f) Did Mid-America supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Milwaukee County Local Emergency Planning Committee for the period of January 1, 2015, to December 31, 2015, on or before March 1, 2016? If so, provide documentation to support your claim;

(g) Did Mid-America supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Oak Creek Fire Department for the period of January 1, 2015, to December 31, 2015, on or before March 1, 2016? If so, provide documentation to support your claim.

Response No. 24. CLCM conducted business at 8570 South Chicago Road Oak Creek, Wisconsin, during the time period of January 1, 2015 to December 31, 2015.

(a) The CLCM Facility did use, produce, manufacture, and/or store hazardous chemicals at this location during the period of January 1, 2015 to December 31, 2015.

(b) The Tier 2 report which includes a list of the chemicals stored and the quantities stored that exceeded the reporting thresholds during the period of January 1, 2015 to December 31, 2015 is enclosed with this Response and labeled as document Bates No. CLCM-EPCRA-Oak Creek-Q24(b)-000001 to Bates No. CLCM-EPCRA-Oak Creek-Q24(b)-000005.

(c) MSDS for the chemicals listed in 24(b) are enclosed with this Response and labeled as documents Bates No. CLCM-EPCRA-Oak Creek-Q24(c)-000001 to Bates No. CLCM-EPCRA-Oak Creek-Q24(c)-000007.

(d) Required forms for the period from January 1, 2015 to December 31, 2015 are enclosed with this Response and labeled as documents Bates No. CLCM-EPCRA-Oak Creek-Q24(d)-(g)-000001 to Bates No. CLCM-EPCRA-Oak Creek-Q24(d)-(g)-000005. The CLCM Facility is currently evaluating whether the CLCM Facility exceeded reporting thresholds for diesel fuel at any point in 2013, 2014 or 2015 or rock salt at any point in 2013, 2014, 2015, or 2016. The CLCM Facility will promptly submit the applicable reports, if the CLCM Facility determines that such reports were required.

(e) Copies of the forms provided in response to Request 24(d) were provided to Wisconsin Emergency Management, which is the State Emergency Response Commission, prior to March 1, 2016. Documentation responsive to this request is enclosed with this Response and labeled as documents Bates No. CLCM-EPCRA-Oak Creek-Q24(d)-(g)-000001 to Bates No. CLCM-EPCRA-Oak Creek-Q24(d)-(g)-000005.

(f) Copies of the forms provided in response to Request 24(d) were made available to the Milwaukee County Local Emergency Planning Committee prior to March 1, 2016. Documentation responsive to this request is enclosed with this Response and labeled as documents Bates No. CLCM-EPCRA-Oak Creek-Q24(d)-(g)-000001 to Bates No. CLCM-EPCRA-Oak Creek-Q24(d)-(g)-000005.

(g) Copies of the forms provided in response to Request 24(d) were made available to the Oak Creek Fire Department prior to March 1, 2016. Documentation responsive to this request is enclosed with this Response and labeled as documents Bates No. CLCM-EPCRA-Oak Creek-Q24(d)-(g)-000001 to Bates No. CLCM-EPCRA-Oak Creek-Q24(d)-(g)-000005.

REQUEST NO. 25. *Was Mid-America conducting business at 8570 South Chicago Road, Oak Creek, Wisconsin, during the time period of January 1, 2016, to December 31, 2016? If so, please respond to the following information requests:*

(a) Did Mid-America use, produce, manufacture, and/or store any hazardous chemicals at this location during the period of January 1, 2016, to December 31, 2016?;

(b) If Mid-America did use, produce, manufacture, and/or store any hazardous chemicals at this location, provide a list of such hazardous chemicals and the maximum quantity stored at this facility at any one given time during the period of January 1, 2016, to December 31, 2016;

(c) For each hazardous chemical listed in number 25(b), provide an MSDS. If you already provided an MSDS for a hazardous chemical in information request number 22, 23, or 24, you need not provide another one for the same hazardous chemical;

(d) Provide a copy of the Tier One or Tier Two form required under Section 312 of EPCRA, 42 U.S.C. § 11022, for the period of January 1, 2016, to December 31, 2016;

(e) Did Mid-America supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Wisconsin State Emergency Response Commission for the period of January 1, 2016, to December 31, 2016, on or before March 1, 2017? If so, provide documentation to support your claim;

(f) Did Mid-America supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Milwaukee County Local Emergency Planning Committee for the period of January 1, 2016, to December 31, 2016, on or before March 1, 2017? If so, provide documentation to support your claim;

(g) Did Mid-America supply a copy of each and every Tier One or Tier Two form provided under subparagraph (d) above to the Oak Creek Fire Department for the period of January 1, 2016, to December 31, 2016, on or before March 1, 2017? If so, provide documentation to support your claim.

Response No. 25. CLCM conducted business at 8570 South Chicago Road Oak Creek, Wisconsin, during the time period of January 1, 2016 to December 31, 2016.

(a) The CLCM Facility did use, produce, manufacture, and/or store hazardous chemicals at this location during the period of January 1, 2016 to December 31, 2016.

(b) The Tier 2 report which includes a list of the chemicals stored and the quantities stored that exceeded the reporting thresholds during the period January 1, 2016 to December 31, 2016 is enclosed with this Response and labeled as document Bates No. CLCM-EPCRA-Oak Creek-Q25(b)-000001 to Bates No. CLCM-EPCRA-Oak Creek-Q25(b)-000014.

(c) MSDS for the chemicals listed in 25(b) are enclosed with this Response and labeled as documents Bates No. CLCM-EPCRA-Oak Creek-Q25(c)-000001 to Bates No. CLCM-EPCRA-Oak Creek-Q25(c)-000199.

(d) Required forms for the period from January 1, 2016 to December 31, 2016 are enclosed with this Response and labeled as documents Bates No. CLCM-EPCRA-Oak Creek-Q25(d)-(g)-000001 to Bates No. CLCM-EPCRA-Oak Creek-Q25(d)-(g)-000014. The CLCM Facility is currently evaluating whether the CLCM Facility exceeded reporting thresholds for diesel fuel at any point in 2013, 2014 or 2015 or rock salt at any point in 2013, 2014, 2015, or 2016. The CLCM Facility will promptly submit the applicable reports, if the CLCM Facility determines that such reports were required.

(e) Copies of the forms provided in response to Request 25(d) were provided to Wisconsin Emergency Management, which is the State Emergency Response Commission, prior to March 1, 2017. Documentation responsive to this request is enclosed with this Response and labeled as documents Bates No. CLCM-EPCRA-Oak Creek-Q25(d)-(g)-000001 to Bates No. CLCM-EPCRA-Oak Creek-Q25(d)-(g)-000014.

(f) Copies of the forms provided in response to Request 25(d) were made available to the Milwaukee County Local Emergency Planning Committee prior to March 1, 2017. Documentation responsive to this request is enclosed with this Response and labeled as documents Bates No. CLCM-EPCRA-Oak Creek-Q25(d)-(g)-000001 to Bates No. CLCM-EPCRA-Oak Creek-Q25(d)-(g)-000014.

(g) Copies of the forms provided in response to Request 25(d) were made available to the Oak Creek Fire Department prior to March 1, 2017. Documentation responsive to this request is enclosed with this Response and labeled as documents Bates No. CLCM-EPCRA-Oak Creek-Q25(d)-(g)-000001 to Bates No. CLCM-EPCRA-Oak Creek-Q25(d)-(g)-000014.

AS TO OBJECTIONS:

CONTAINER LIFE CYCLE MANAGEMENT LLC

Dated: June 8, 2017

By: _____
Linda E. Benfield
Attorney for Container Life Cycle Management LLC

ADDRESS:
Foley & Lardner LLP
777 East Wisconsin Avenue
Milwaukee, WI 53202-5306
lbenfield@foley.com

AFFIDAVIT OF MARK FURGASON

STATE OF WISCONSIN)
) ss.
COUNTY OF MILWAUKEE)

Mark Furgason, being first duly sworn on oath, states as follows:

(1) I am the Plant Manager of and am familiar with the facility owned by Container Life Cycle Management LLC ("CLCM") located at 3950 South Pennsylvania Avenue, St. Francis, Wisconsin.

(2) I make this affidavit in support of CLCM's response to the United States Environmental Protection Agency's ("U.S. EPA") request pursuant to Sections 311 and 312 of the Emergency Planning and Community Right-to-Know Act for information regarding the facility located at 3950 South Pennsylvania Avenue, St. Francis, Wisconsin dated June 8, 2017 (the "Response").

(3) The objections asserted in the Response are authorized by CLCM.

(4) CLCM has completed a diligent record search and a diligent interviewing process with employees who may have relevant knowledge of the operations and activities at the facility that are the subject of the Response.

(5) To the best of my knowledge, based upon the information currently in CLCM's possession and subject to the objections asserted in the Response, this Response is true, correct and accurate. CLCM reserves the right to revise, amend and/or update the Response in the future if CLCM obtains additional relevant or responsive information.

(6) I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete.

Mark Furgason
Plant Manager

Subscribed and sworn to before me
this 8 day of June, 2017

Sherry L. Kannenberg
NOTARY PUBLIC, State of Wisconsin
My Commission is/expires: 1-19-2018

SHERRY L KANNENBERG
Notary Public
State of Wisconsin

Janard, Inc.

January 29, 2014

Scott Swosinski, Vice President/General Manager
MID-AMERICA STEEL DRUM CO., INC.
8570 South Chicago Road
Oak Creek, WI 53154

Dear Scott:

Attached is a copy of your completed **SARA Title III, Tier 2 report for year ending 2013.** I have prepared and submitted the report electronically and a copy goes to the State Emergency Management authorities with a copy to your local fire department and the County Emergency Government so they each are aware of what you have at the plant and they can be prepared to respond to an emergency situation there. It has already been submitted and each agency will receive a copy electronically.

The only thing you have to do is to issue a check in the amount of $205.00 if paid by March 1st or $246.00 if paid after March 1st made payable to Wisconsin Emergency Management and then mail it along with the 2013 Tier II Invoice (detached) to the following address:

Wisconsin Emergency Management
FEE PROCESSING SERVICE
Drawer 988
Milwaukee, WI 53293-0988

The attached copy is for your files. As always, if you have any questions about this please feel free to contact me at your convenience.

Very truly yours,
JANARD, INC.

Richard Lyle, President

WISCONSIN 2013 EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

PO Box 7978, Madison, WI 53707-7978
Phone: 608-242-3221

WISCONSIN EMERGENCY MANAGEMENT
DMA 1004 (R11-09) Wis. Stat 323.60

Reporting Period From January 1, 2013 to December 31, 2013

☑ Annual ☐ Revision ☑ Facility Information is changed from Last Submission

Facility Identification

ID	: 78526				
Name	: MID-AMERICA STEEL DRUM CO., INC.				
Street	: 8570 SOUTH CHICAGO ROAD	City	:	OAK CREEK	
State	: WI	Zip	:	53154	
County	: MILWAUKEE COUNTY				
LEPC Name	: Milwaukee County LEPC	Tribe	:	☐	
Lat/Long	: 42.8661604/-87.8624821	Fire Department	:	OAK CREEK FIRE DEPT	
Contact Name	: Scott Swosinski	Phone	:	(414) 762-1114	
Fax	: (414) 762-1623	Email	:	sswosinski@midamericasteeldrum.com	
Maximum Occupants	: 70	☑ Manned	☐ Unmanned		
SIC Code	: 3412	Dun & Brad No	:	NA	
NAICS	: 332439	TRIFID	:	53154MDMRC8570S	

Subject to Emergency Planning under Section 302 of EPCRA (40 CFR part 355)? ☑ Yes ☐ No

Subject to Chemical Accident Prevention under Section 112(r) of CAA (40 CFR part 68, Risk Management Program)? RMP Facility ID : ☐ Yes ☑ No

Subject to Toxic Release Inventory under Section 313 of EPCRA (40 CFR part 372)? TRI Facility ID : 53154MDMRC8570S ☑ Yes ☐ No

Owner/Operator Details

Name	: MID AMERICA STEEL DRUM CO. INC.		
Address	: 8570 SOUTH CHICAGO ROAD OAK CREEK, WI 53154 United States		
Phone	: (414) 762-1114	Email	: SSWOSINSKI@MASDINC.COM

Parent Company Details

Name	: MID-AMERICA STEEL DRUM CO., INC.		
Address	: 8570 SOUTH CHICAGO ROAD OAK CREEK, WI 53154 United States		
Phone	: (414) 762-1114	Email	: sswosinski@midamericasteeldrum.com
Dun and Brad No	: NA		

Facility Emergency Coordinator

Name	: SCOTT SWOSINSKI	Title	: VP GENERAL MANAGER
Phone	: (414) 762-1114	24 Hr. Phone	: (414) 304-1314
Email	: SSWOSINSKI@MASDINC.COM		

Mailing Address if different from Facility ID Address

Company	: MID-AMERICA STEEL DRUM CO., INC.	Attn	: SCOTT SWOSINSKI
Street Address 1	: 8570 SOUTH CHICAGO ROAD	Street Address 2	:
City	: OAK CREEK	State	: WI
Zip	: 53154	Phone	: (414) 762-1114
Country	: United States		

Tier II Information Contact

Name	: KEVIN MEYER	Title	: PLANT MANAGER
Phone	: (414) 762-1114	24 Hr. Phone	: (262) 785-9007
Email	: KMEYER@MASDINC.COM		

Emergency Contacts

Sl.No	Name	Title	Phone	24 Hr.Phone	Email
1	SCOTT SWOSINKSI	VP GENERAL MANAGER	(414) 762-1114	(414) 304-1314	SWOSINSKI@MASDINC.COM
2	KEVIN MEYER	PLANT MANAGER	(414) 762-1114	(262) 785-9007	KMEYER@MASDINC.COM

Certification: I certify under penalty of law that I have personally examined and am familiar with the information submitted, and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Richard Lyle, Consultant, Jenard, Inc.	1/29/2014 2:45 PM	(262) 782-1150	Richard Lyle
Name and official title of owner/operator or authorized representative	Date	Telephone Number	Signature

Optional Attachments

☑
☐ Site Coordinate Abbreviations
☐ Other Safeguard measures

CLCM-EPCRA-OAK CREEK-Q22(b)-000002

EPA-R5-2018-002961_0000496

WISCONSIN 2013 EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Facility Name : MID-AMERICA STEEL DRUM CO., INC. ID : 78526

Reporting Period From January 1, 2013 to December 31, 2013

Reporting Exemption ☐ Exempt ☑ Not Exempt

Reason for Reporting Exemption (See Resources for definitions of Fee/Reporting Exemptions)

- ☐ a. This facility is not covered by the OSHA Hazard Communication Act and is not a private or public agency as defined by s. 323.60 (1)(h) and (i).
- ☐ b. Per OSHA Hazard Communication Act regulations, hazardous chemicals present at this facility are not required to have Material Safety Data Sheets prepared for them or available to the facility because of one or more of the eight reporting exemptions at CFR Chapter 29, Section 1910.1200(b). (See Resources link for eight OSHA Reporting Exemptions)
- ☐ c. Hazardous chemicals at this facility fall under one or more of the section 311(e) reporting exemptions. (See Resources for five 311(e) Reporting Exemptions)
- ☐ d. This is a Retail Gas Station and the higher reporting thresholds for gasoline and diesel fuel apply. (See instructions in the Resources link)

Fee Exemption ☐ Exempt ☑ Not Exempt

Reason for Fee Exemption

- ☐ a. The operator of this facility had fewer than 10 full-time equivalent employees (20,080 hrs.) in the state of Wisconsin in 2013. There were a Total of 70 full-time equivalent employees.
- ☐ b. This is a Federal or federally recognized Tribal facility.

Partial Fee Exemption ☐ Exempt ☑ Not Exempt

Reason for Partial Fee Exemption (See Resources for definitions of Fee/Reporting Exemptions)

- ☐ a. Chemical is gasoline and/or diesel fuel present in reportable quantities and held for resale or retail at a petroleum marketing facility.
- ☐ b. Chemical is gasoline and/or diesel fuel at a retail gas station was stored in a tank(s) entirely underground, and 2) the facility was in compliance with all applicable Underground Storage program requirements at all times during the preceding calendar year, and 3) less than 75,000 gallons of gasoline and/or 100,000 gallons of diesel fuel were present any one time.
- ☐ c. Chemical is sand and/or gravel present in reportable quantities.
- ☐ d. Chemical is calcium chloride, sodium chloride and/or calcium magnesium acetate present in reportable quantities and used as a road deicing agent.
- ☐ e. Chemical is reported voluntarily and is not present in reportable quantities or exempt from reporting for Section 311(e) (MSDS/Chemical List), Section 312 (annual Tier Two Reporting), and the OSHA Hazard Communications Act regulations.

WISCONSIN 2013 EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Facility Name : MID-AMERICA STEEL DRUM CO., INC. ID : 78526

Reporting Period From January 1, 2013 to December 31, 2013

Chemical Description	Physical & Health Hazards	Inventory	Storage Codes & Location
Chemical ID : 11913 Chemical Information is changed from Last Submission : ☐ CAS : 7664939 Trade Secret : ☐ Chemical Name : SULFURIC ACID EHS : ☑ Contains EHS : ☐ EHS Name : SULFURIC ACID ☑ Pure ☐ Mix ☐ Solid ☑ Liquid ☐ Gas	☐ Fire ☐ Pressure ☑ Reactivity ☑ Immediate ☑ Delayed (Chronic)	1500 Max Daily Amt(lbs) 04 Max Daily Amount Code 800 Ave. Daily Amount (lbs.) 03 Ave. Daily Amount Code 365 No of days on site	Container Type: (E) Plastic or nonmetallic drum Pressure: (1) Ambient pressure Temperature: (1) Ambient temperature Storage Location: STORAGE AREA AND WASTEWATER TREATMENT Description: Max Amt At Location(lbs): 1650

Fee and/or Reporting Exemption

- ☐ Chemical is gasoline or diesel fuel, held for resale or retail.
- ☐ Chemical is gasoline and/or diesel fuel was stored in a tank(s) entirely underground.
- ☐ Chemical is sand and/or gravel.
- ☐ Chemical is calcium chloride, sodium chloride or calcium magnesium acetate used for deicing agent.
- ☐ Chemical is reported voluntarily.

2013 TIER II INVOICE

For chemicals present during the calendar year 2013

MID-AMERICA STEEL DRUM CO., INC.

Attn: SCOTT SWOSINSKI

8570 SOUTH CHICAGO ROAD
OAK CREEK, WI 53154

INVOICE DATE: 1/29/2014

INVOICE NUMBER: 180042

Facility ID: 78526

EIN: 39-1216818

County: MILWAUKEE COUNTY

Facility Type	Fee Type	Item	Amount
Facility	I	Tier II Fee	$205.00
Facility	I	Late Fee if payment is received after 3/1/2014	$41.00
Total		**If payment received by 3/1/2014**	**$205.00**
		If payment received after 3/1/2014	**$246.00**

Total Reportable Chemicals	1
# of Exempt Chemicals	0
# of Non-Exempt Chemicals	1
☐ equal to or over 100,000 pounds	
☑ less than 100,000	

Facility Owner Information

Owner Name: MID AMERICA STEEL DRUM CO. INC.

Owner Address: 8570 SOUTH CHICAGO ROAD
OAK CREEK, WI 53154
US

Make checks payable to: **Wisconsin Emergency Management**
Mail to: **Wisconsin Emergency Management**
Fee Processing Service
Drawer 988
Milwaukee, WI 53293-0988

Janard, Inc. *Environmental and OSHA Compliance Consultants*

P.O. Box 2011 * Brookfield, WI 53008-2011 * Ph: (262) 792-1150 * Fax: (262) 792-1152

January 22, 2015

Scott Swosinski, Vice President/General Manager
MID-AMERICA STEEL DRUM CO., INC.
8570 South Chicago Road
Oak Creek, WI 53154

Dear Scott:

Enclosed is a copy of your completed **SARA Title III, Tier 2 report for year ending 2014**. I'm able to prepare and submit the report electronically, which I have done already. This required report goes to the State Emergency Management authorities annually with a copy to your local fire department and the County Emergency Government so they can be aware of what hazardous materials you have at the plant in certain reportable quantities and can be prepared to respond to an emergency situation there. Each agency gets a copy of the report electronically.

The only thing you have to do is to issue a check in the amount of $205.00 if paid by March 1st or $246.00 if paid after March 1st made payable to Wisconsin Emergency Management and then mail it along with the 2014 Tier II Invoice (detached) to the following address:

Wisconsin Emergency Management
FEE PROCESSING SERVICE
Drawer 988
Milwaukee, WI 53293-0988

The attached copy is for your files. As always, if you have any questions about this please feel free to contact me at your convenience.

Very truly yours,
JANARD, INC.

Richard Lyle, President

WISCONSIN 2014 EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

PO Box 7978, Madison, WI 53707-7978
Phone: 608-242-3221

WISCONSIN EMERGENCY MANAGEM
DMA 1004 (R11-09) Wis. Stat 32

Reporting Period From January 1, 2014 to December 31, 2014

☑ Annual ☐ Revision ☑ Facility Information is changed from Last Submission

Facility Identification

ID	:	78526			
Name	:	MID-AMERICA STEEL DRUM CO., INC.			
Street	:	8570 SOUTH CHICAGO ROAD	City	:	OAK CREEK
State	:	WI	Zip	:	53154
County	:	MILWAUKEE COUNTY			
LEPC Name	:	Milwaukee County LEPC	Tribe	:	☐
Lat/Long	:	42.8861604/-87.8624821	Fire Department	:	OAK CREEK FIRE DEPT
Contact Name	:	Scott Swosinski	Phone	:	(414) 762-1114
Fax	:	(414) 762-1623	Email	:	sswosinski@midamericasteeldrum.com
Maximum Occupants	:	70	☑ Manned	☐ Unmanned	

SIC Code	:	3412	Dun & Brad No	:	NA
NAICS	:	332439	TRIFID	:	53154MDMRC8570S

Subject to Emergency Planning under Section 302 of EPCRA (40 CFR part 355)? ☑ Yes ☐ No

Subject to Chemical Accident Prevention under Section 112(r) of CAA (40 CFR part 68, Risk Management Program)? RMP Facility ID : ☐ Yes ☑ No

Subject to Toxic Release Inventory under Section 313 of EPCRA (40 CFR part 372)? TRI Facility ID : 53154MDMRC8570S ☑ Yes ☐ No

Owner/Operator Details

Name	:	MID-AMERICA STEEL DRUM CO, INC.			
Address	:	8570 SOUTH CHICAGO ROAD OAK CREEK, WI 53154 United States			
Phone	:	(414) 762-1114	Email	:	SSWOSINSKI@MASDINC.C

Parent Company Details

Name	:	MID-AMERICA STEEL DRUM CO., INC.			
Address	:	8570 SOUTH CHICAGO ROAD OAK CREEK, WI 53154 United States			
Phone	:	(414) 762-1114	Email	:	sswosinski@midamericasteeldrum
Dun and Brad No	:	NA			

Facility Emergency Coordinator

Name	:	SCOTT SWOSINSKI	Title	:	VP GENERAL MANAGER
Phone	:	(414) 762-1114	24 Hr. Phone	:	(414) 304-1314
Email	:	SSWOSINSKI@MASDINC.COM			

Mailing Address if different from Facility ID Address

Company	:	MID-AMERICA STEEL DRUM CO., INC.	Attn	:	SCOTT SWOSINSKI
Street Address 1	:	8570 SOUTH CHICAGO ROAD	Street Address 2	:	
City	:	OAK CREEK	State	:	WI
Zip	:	53154	Phone	:	(414) 762-1114
Country	:	United States			

Tier II Information Contact

Name	:	KEVIN MEYER	Title	:	PLANT MANAGER
Phone	:	(414) 762-1114	24 Hr. Phone	:	(262) 785-9007
Email	:	KMEYER@MASDINC.COM			

Emergency Contacts

Sl.No	Name	Title	Phone	24 Hr.Phone	Email
1	SCOTT SWOSINKSI	VP GENERAL MANAGER	(414) 762-1114	(414) 304-1314	SWOSINSKI@MASDINC.COM
2	KEVIN MEYER	PLANT MANAGER	(414) 762-1114	(262) 785-9007	KMEYER@MASDINC.COM

Certification: I certify under penalty of law that I have personally examined and am familiar with the information submitted, and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Richard Lyle, Consultant, Janard, Inc.	1/22/2015 11:26 AM	(262) 792-1150	Richard Lyle
Name and official title of owner/operator or authorized representative	Date	Telephone Number	Signature

Optional Attachments

☑ Site Plan
☐ Site Coordinate Abbreviations
☐ Other Safeguard measures

CLCM-EPCRA-OAK CREEK-Q23(b)-000002

EPA-R5-2018-002961_0000496

WISCONSIN 2014 EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Facility Name : MID-AMERICA STEEL DRUM CO., INC. ID : 78526

Reporting Period From January 1, 2014 to December 31, 2014

Reporting Exemption ☐ Exempt ☑ Not Exempt

Reason for Reporting Exemption (See Resources for definitions of Fee/Reporting Exemptions)

☐ a. This facility is not covered by the OSHA Hazard Communication Act and is not a private or public agency as defined by s. 323.60 (1)(h) and (i).

☐ b. Per OSHA Hazard Communication Act regulations, hazardous chemicals present at this facility are not required to have Material Safety Data Sheets prepared for them or available to the facility because of one or more of the eight reporting exemptions at CFR Chapter 29, Section 1910.1200(b). (See Resources link for eight OSHA Reporting Exemptions)

☐ c. Hazardous chemicals at this facility fall under one or more of the section 311(e) reporting exemptions. (See Resources for five 311(e) Reporting Exemptions)

☐ d. This is a Retail Gas Station and the higher reporting thresholds for gasoline and diesel fuel apply. (See instructions in the Resources link)

Fee Exemption ☐ Exempt ☑ Not Exempt

Reason for Fee Exemption

☐ a. The operator of this facility had fewer than 10 full-time equivalent employees (20,080 hrs.) in the state of Wisconsin in 2014. There were a Total of 70 full-time equivalent employees.

☐ b. This is a Federal or federally recognized Tribal facility.

Partial Fee Exemption ☐ Exempt ☑ Not Exempt

Reason for Partial Fee Exemption (See Resources for definitions of Fee/Reporting Exemptions)

☐ a. Chemical is gasoline and/or diesel fuel present in reportable quantities and held for resale or retail at a petroleum marketing facility.

☐ b. Chemical is gasoline and/or diesel fuel at a retail gas station was stored in a tank(s) entirely underground, and 2) the facility was in compliance with all applicable Underground Storage program requirements at all times during the preceding calendar year, and 3) less than 75,000 gallons of gasoline and/or 100,000 gallons of diesel fuel were present any one time.

☐ c. Chemical is sand and/or gravel present in reportable quantities.

☐ d. Chemical is calcium chloride, sodium chloride and/or calcium magnesium acetate present in reportable quantities and used as a road deicing agent.

☐ e. Chemical is reported voluntarily and is not present in reportable quantities or exempt from reporting for Section 311(e) (MSDS/Chemical List), Section 312 (annual Tier Two Reporting), and the OSHA Hazard Communications Act regulations.

WISCONSIN 2014 EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Facility Name : MID-AMERICA STEEL DRUM CO., INC. ID : 78526

Reporting Period From January 1, 2014 to December 31, 2014

Chemical Description		Physical & Health Hazards		Inventory	
Chemical ID	: 11913	☐ Fire		1500	Max Daily Amt(lbs)
Chemical Information is changed from Last Submission	: ☐	☐ Pressure		04	Max Daily Amount Code
CAS	: 7664939	☑ Reactivity		800	Ave. Daily Amount (lbs.)
Trade Secret	: ☐	☑ Immediate		03	Ave. Daily Amount Code
Chemical Name	: SULFURIC ACID	☑ Delayed (Chronic)		365	No of days on site
EHS	: ☑ Contains EHS : ☐				
EHS Name	: SULFURIC ACID				
☑ Pure ☐ Mix ☐ Solid ☑ Liquid ☐ Gas					

Storage Codes & Location

Container Type	Pressure	Temperature	Storage Location	Description	Max Amt At Location(lbs)
[E] Plastic or nonmetallic drum	[1] Ambient pressure	[4] Ambient temperature	STORAGE AREA AND WASTEWATER TREATMENT		1500

Fee and/or Reporting Exemption

- ☐ Chemical is gasoline or diesel fuel, held for resale or retail.
- ☐ Chemical is gasoline and/or diesel fuel was stored in a tank(s) entirely underground.
- ☐ Chemical is sand and/or gravel.
- ☐ Chemical is calcium chloride, sodium chloride or calcium magnesium acetate used for deicing agent.
- ☐ Chemical is reported voluntarily.

Notes	
Notes entered by Company/Facility User	Re: Mid-America Steel Drum Co, Inc., FID #78526, no longer has sulfuric acid on site nor any other hazardous materials in a reportable quantity and, therefore, will not t submitting a report this year. The last day it had sulfuric acid on site was 6/1/2015. Richard Janard 1/26/16

Janard, Inc. *Environmental and OSHA Compliance Consultants*

P.O. Box 2011 • Brookfield, WI 53008-2011 • Ofc: (262) 792-1150 • Fax: (262) 792-1152

January 19, 2016

Scott Swosinski, Vice President/General Manager
MID-AMERICA STEEL DRUM CO., INC.
8570 South Chicago Road
Oak Creek, WI 53154

Dear Scott:

Enclosed is a copy of your completed **SARA Title III, Tier 2 report for year ending 2015**. I'm able to prepare and submit the report electronically, which I have done already. This required report goes to the State Emergency Management authorities annually with a copy to your local fire department and the County Emergency Government so they can be aware of what hazardous materials you have at the plant in certain reportable quantities and can be prepared to respond to an emergency situation there. Each agency gets a copy of the report electronically.

The only thing you have to do is to issue a check in the amount of $205.00 if paid by March 1st or $246.00 if paid after March 1st made payable to Wisconsin Emergency Management and then mail it along with the 2015 Tier II Invoice (detached) to the following address:

Wisconsin Emergency Management
FEE PROCESSING SERVICE
Drawer 988
Milwaukee, WI 53293-0988

The attached copy is for your files. As always, if you have any questions about this please feel free to contact me at your convenience.

Very truly yours,
JANARD, INC.

Richard Lyle, President

WISCONSIN 2015 EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

PO Box 7978, Madison, WI 53707-7978
Phone: 608-242-3221

WISCONSIN EMERGENCY MANAGEMENT
DMA 1004 (R11-09) Wis. Stat 323.60

Reporting Period From January 1, 2015 to December 31, 2015

☑ Annual ☐ Revision ☐ Facility Information is changed from Last Submission

Facility Identification

ID	: 78526				
Name	: MID-AMERICA STEEL DRUM CO., INC.				
Street	: 8570 SOUTH CHICAGO ROAD	City	:	OAK CREEK	
State	: WI	Zip	:	53154	
County	: MILWAUKEE COUNTY				
LEPC Name	: Milwaukee County LEPC	Tribe	:	☐	
Lat/Long	: 42.8681604/-87.8624821	Fire Department	:	OAK CREEK FIRE DEPT	
Contact Name	: Scott Swosinski	Phone	:	(414) 762-1114	
Fax	: (414) 762-1623	Email	:	sswosinski@midamericasteeldrum.com	
Maximum Occupants	: 70	☑ Manned	☐ Unmanned		

SIC Code	: 3412	Dun & Brad No	: NA
NAICS	: 332439	TRIFID	: 53154MDMRC8570S

Subject to Emergency Planning under Section 302 of EPCRA (40 CFR part 355)? ☑ Yes ☐ No

Subject to Chemical Accident Prevention under Section 112(r) of CAA (40 CFR part 68, Risk Management Program)? RMP Facility ID : ☐ Yes ☑ No

Subject to Toxic Release Inventory under Section 313 of EPCRA (40 CFR part 372)? TRI Facility ID : 53154MDMRC8570S ☑ Yes ☐ No

Mailing Address if different from Facility ID Address

Company	: MID-AMERICA STEEL DRUM CO., INC.	Attn	: SCOTT SWOSINSKI
Street Address 1	: 8570 SOUTH CHICAGO ROAD	Street Address 2	:
City	: OAK CREEK	State	: WI
Zip	: 53154	Phone	: (414) 762-1114
Country	: United States		

Owner/Operator Details

Name	: MID AMERICA STEEL DRUM CO. INC.		
Address	: 8570 SOUTH CHICAGO ROAD OAK CREEK, WI 53154 United States		
Phone	: (414) 762-1114	Email	: SSWOSINSKI@MASDINC.COM

Parent Company Details

Name	: MID-AMERICA STEEL DRUM CO., INC.		
Address	: 8570 SOUTH CHICAGO ROAD OAK CREEK, WI 53154 United States		
Phone	: (414) 762-1114	Email	: sswosinski@midamericasteeldrum.com
Dun and Brad No	: NA		

Facility Emergency Coordinator

Name	: SCOTT SWOSINSKI	Title	: VP GENERAL MANAGER
Phone	: (414) 762-1114	24 Hr. Phone	: (414) 304-1314
Email	: SSWOSINSKI@MASDINC.COM		

Tier II Information Contact

Name	: KEVIN MEYER	Title	: PLANT MANAGER
Phone	: (414) 762-1114	24 Hr. Phone	: (262) 785-9007
Email	: KMEYER@MASDINC.COM		

Emergency Contacts

Sl.No	Name	Title	Phone	24 Hr.Phone	Email
1	SCOTT SWOSINKSI	VP GENERAL MANAGER	(414) 762-1114	(414) 304-1314	SWOSINSKI@MASDINC.COM
2	KEVIN MEYER	PLANT MANAGER	(414) 762-1114	(262) 785-9007	KMEYER@MASDINC.COM

Certification: I certify under penalty of law that I have personally examined and am familiar with the information submitted, and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Richard Lyle, Janard, Inc.	1/19/2016 1:36 PM	(414) 303-4712	Richard Lyle
Name and official title of owner/operator or authorized representative	Date	Telephone Number	Signature

Optional Attachments

☑ Site Plan
☐ Site Coordinate Abbreviations
☐ Other Safeguard measures

CLCM-EPCRA-OAK CREEK-Q24(b)-000002

EPA-R5-2018-002961_0000496

WISCONSIN 2015 EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Facility Name : MID-AMERICA STEEL DRUM CO., INC. ID : 78526

Reporting Period From January 1, 2015 to December 31, 2015

Reporting Exemption ☐ Exempt ☑ Not Exempt

Reason for Reporting Exemption (See Resources for definitions of Fee/Reporting Exemptions)

☐ a. This facility is not covered by the OSHA Hazard Communication Act and is not a private or public agency as defined by s. 323.60 (1)(h) and (i).

☐ b. Per OSHA Hazard Communication Act regulations, hazardous chemicals present at this facility are not required to have Material Safety Data Sheets prepared for them or available to the facility because of one or more of the eight reporting exemptions at CFR Chapter 29, Section 1910.1200(b). (See Resources link for eight OSHA Reporting Exemptions)

☐ c. Hazardous chemicals at this facility fall under one or more of the section 311(e) reporting exemptions. (See Resources for five 311(e) Reporting Exemptions)

☐ d. This is a Retail Gas Station and the higher reporting thresholds for gasoline and diesel fuel apply. (See instructions in the Resources link)

Fee Exemption ☐ Exempt ☑ Not Exempt

Reason for Fee Exemption

☐ a. The operator of this facility had fewer than 10 full-time equivalent employees (20,000 hrs.) in the state of Wisconsin in 2015. There were a Total of 70 full-time equivalent employees.

☐ b. This is a Federal or federally recognized Tribal facility.

Partial Fee Exemption ☐ Exempt ☑ Not Exempt

Reason for Partial Fee Exemption (See Resources for definitions of Fee/Reporting Exemptions)

☐ a. Chemical is gasoline and/or diesel fuel present in reportable quantities and held for resale or retail at a petroleum marketing facility.

☐ b. Chemical is gasoline and/or diesel fuel at a retail gas station was stored in a tank(s) entirely underground, and 2) the facility was in compliance with all applicable Underground Storage program requirements at all times during the preceding calendar year, and 3) less than 75,000 gallons of gasoline and/or 100,000 gallons of diesel fuel were present any one time.

☐ c. Chemical is sand and/or gravel present in reportable quantities.

☐ d. Chemical is calcium chloride, sodium chloride and/or calcium magnesium acetate present in reportable quantities and used as a road deicing agent.

☐ e. Chemical is reported voluntarily and is not present in reportable quantities or exempt from reporting for Section 311(e) (MSDS/Chemical List), Section 312 (annual Tier Two Reporting), and the OSHA Hazard Communications Act regulations.

WISCONSIN 2015 EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Facility Name : MID-AMERICA STEEL DRUM CO., INC. ID : 78526

Reporting Period From January 1, 2015 to December 31, 2015

Chemical Description

Chemical ID	: 11913
Chemical Information is changed from Last Submission	: ☐
CAS	: 7664939
Trade Secret	: ☐
Chemical Name	: SULFURIC ACID
EHS	: ☑ Contains EHS : ☐
EHS Name	: SULFURIC ACID

☑ Pure ☐ Mix ☐ Solid ☑ Liquid ☐ Gas

Physical & Health Hazards

☐	Fire	1500	Max Daily Amt(lbs)
☐	Pressure	04	Max Daily Amount Code
☑	Reactivity	800	Ave. Daily Amount (lbs.)
☑	Immediate	03	Ave. Daily Amount Code
☑	Delayed (Chronic)	365	No of days on site

Storage Codes & Location

Container Type	Pressure	Temperature	Storage Location	Description	Max Amt At Location(lbs)
[E] Plastic or nonmetallic drum	[1] Ambient pressure	[4] Ambient temperature	STORAGE AREA AND WASTEWATER TREATMENT		1500

Fee and/or Reporting Exemption

- ☐ Chemical is gasoline or diesel fuel, held for resale or retail.
- ☐ Chemical is gasoline and/or diesel fuel was stored in a tank(s) entirely underground.
- ☐ Chemical is sand and/or gravel.
- ☐ Chemical is calcium chloride, sodium chloride or calcium magnesium acetate used for deicing agent.
- ☐ Chemical is reported voluntarily.

2015 TIER II INVOICE

For chemicals present during the calendar year 2015

MID-AMERICA STEEL DRUM CO., INC.

Attn: SCOTT SWOSINSKI

8570 SOUTH CHICAGO ROAD
OAK CREEK, WI 53154

INVOICE DATE: 1/19/2016

INVOICE NUMBER: 191627

Facility ID: 78526

EIN: 39-1216818

County: MILWAUKEE COUNTY

Facility Type	Fee Type	Item	Amount
Facility	I	Tier II Fee	$205.00
Facility	I	Late Fee if payment is received after 3/1/2016	$41.00
Total		**If payment received by 3/1/2016**	**$205.00**
		If payment received after 3/1/2016	**$246.00**

Total Reportable Chemicals	1
# of Exempt Chemicals	0
# of Non-Exempt Chemicals	1
☐ equal to or over 100,000 pounds	
☑ less than 100,000	

Facility Owner Information

Owner Name: MID AMERICA STEEL DRUM CO. INC.

Owner Address: 8570 SOUTH CHICAGO ROAD
OAK CREEK, WI 53154
US

Make checks payable to: **Wisconsin Emergency Management**
Mail to: **Wisconsin Emergency Management**
Fee Processing Service
Drawer 988
Milwaukee, WI 53293-0988

Janard, Inc. *Environmental and OSHA Compliance Consultants*

P.O. Box 2011 * Brookfield, WI 53008-2011 * Ph: (262) 792-1150 * Fax: (262) 792-1152

February 21, 2017

Kevin Meyer, Plant Manager
MID-AMERICA STEEL DRUM CO., INC.
8570 South Chicago Road
Oak Creek, WI 53154

Dear Kevin:

Enclosed is a copy of your completed **SARA Title III, Tier 2 report for year ending 2016. I'm able to prepare and submit the report electronically, which I have done already.** This required report goes to the State Emergency Management authorities annually with a copy to your local fire department and the County Emergency Government so they can be aware of what hazardous materials you have at the plant in certain reportable quantities and can be prepared to respond to an emergency situation there. Each agency gets a copy of the report electronically.

The only thing you have to do is to issue a check in the amount of $405.00 if paid by March 1st or $486.00 if paid after March 1st made payable to Wisconsin Emergency Management and then mail it along with the 2016 Tier II Invoice (included here) to the following address:

When you print the report you will see the 2016 Tier Two Invoice. Send ONLY that in with your check for the fees. They've already received the report. However, they do not consider the report completed until the fees are paid.

Wisconsin Emergency Management
FEE PROCESSING SERVICE
Drawer 988
Milwaukee, WI 53293-0988

This printed copy is for your files. As always, if you have any questions about this please feel free to contact me at your convenience.

Very truly yours,
JANARD, INC.

Richard Lyle, President

2016 TIER II INVOICE

For chemicals present during the calendar year 2016

MID-AMERICA STEEL DRUM CO., INC.

Attn: KEVIN MEYER

8570 SOUTH CHICAGO ROAD
OAK CREEK, WI 53154

INVOICE DATE: 2/21/2017

INVOICE NUMBER: 200668

Facility ID: 78526

EIN: 39-1216818

County: MILWAUKEE COUNTY

Facility Type	Fee Type	Item	Amount
Facility	I	Tier II Fee	$405.00
Facility	I	Late Fee if payment is received after 3/1/2017	$81.00
Total		**If payment received by 3/1/2017**	**$405.00**
		If payment received after 3/1/2017	**$486.00**

Total Reportable Chemicals	2
# of Exempt Chemicals	0
# of Non-Exempt Chemicals	2
☐ equal to or over 100,000 pounds	
☑ less than 100,000	

Facility Owner Information

Owner Name: MID AMERICA STEEL DRUM CO. INC.

Owner Address: 8570 SOUTH CHICAGO ROAD
OAK CREEK, WI 53154
US

Make checks payable to: **Wisconsin Emergency Management**
Mail to: **Wisconsin Emergency Management**
Fee Processing Service
Drawer 988
Milwaukee, WI 53293-0988

WISCONSIN 2016 EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

PO Box 7978, Madison, WI 53707-7978
Phone: 608-242-3221

WISCONSIN EMERGENCY MANAGEMENT
DMA 1004 (R11-09) Wis. Stat 323.60

Reporting Period From January 1, 2016 to December 31, 2016

☑ Annual ☐ Revision ☑ Facility Information is changed from Last Submission

Facility Identification

ID	:	78526			
Name	:	MID-AMERICA STEEL DRUM CO., INC.			
Street	:	8570 SOUTH CHICAGO ROAD	City	:	OAK CREEK
State	:	WI	Zip	:	53154
County	:	MILWAUKEE COUNTY			
LEPC Name	:	Milwaukee County LEPC	Tribe	:	☐
Lat/Long	:	42.8881604/-87.8624821	Fire Department	:	OAK CREEK FIRE DEPT
Contact Name	:	KEVIN MEYER	Phone	:	(414) 762-1114
Fax	:	(414) 762-1623	Email	:	kmeyer@masdinc.com
Maximum Occupants	:	70	☑ Manned	☐ Unmanned	

SIC Code	:	3412	Dun & Brad No	:	NA
NAICS	:	332439	TRIFID	:	53154MDMRC8570S

Subject to Emergency Planning under Section 302 of EPCRA (40 CFR part 355)? ☑ Yes ☐ No

Subject to Chemical Accident Prevention under Section 112(r) of CAA (40 CFR part 68, Risk Management Program)? RMP Facility ID : ☐ Yes ☑ No

Subject to Toxic Release Inventory under Section 313 of EPCRA (40 CFR part 372)? TRI Facility ID : 53154MDMRC8570S ☑ Yes ☐ No

Mailing Address If different from Facility ID Address

Company	:	MID-AMERICA STEEL DRUM CO., INC.	Attn	:	KEVIN MEYER
Street Address 1	:	8570 SOUTH CHICAGO ROAD	Street Address 2	:	
City	:	OAK CREEK	State	:	WI
Zip	:	53154	Phone	:	(414) 762-1114
Country	:	United States			

Owner/Operator Details

Name	:	MID AMERICA STEEL DRUM CO. INC.			
Address	:	8570 SOUTH CHICAGO ROAD OAK CREEK, WI 53154 United States			
Phone	:	(414) 762-1114	Email	:	kmeyer@masdinc.com

Parent Company Details

Name	:	MID-AMERICA STEEL DRUM CO., INC.			
Address	:	8570 SOUTH CHICAGO ROAD OAK CREEK, WI 53154 United States			
Phone	:	(414) 762-1114	Email	:	kmeyer@masdinc.com
Dun and Brad No	:	NA			

Facility Emergency Coordinator

Name	:	KEVIN MEYER	Title	:	PLANT MANAGER
Phone	:	(414) 762-1114	24 Hr. Phone	:	(414) 235-0277
Email	:	kmeyer@midamericasteeldrum.com			

Tier II Information Contact

Name	:	KEVIN MEYER	Title	:	PLANT MANAGER
Phone	:	(414) 762-1114	24 Hr. Phone	:	(414) 235-0277
Email	:	KMEYER@MASDINC.COM			

Emergency Contacts

Sl.No	Name	Title	Phone	24 Hr.Phone	Email
1	KEVIN MEYER	PLANT MANAGER	(414) 762-1114	(414) 235-0277	kmeyer@midamericasteeldrum.com
2	LARRY PALKOWSKI	Maintenance Supervisor	(414) 762-1114	(414) 235-0287	larryp@masdinc.com

Certification: I certify under penalty of law that I have personally examined and am familiar with the information submitted, and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Richard Lyle, Consultant, Janard, Inc.	2/21/2017 12:44 PM	(414) 303-4712	Richard Lyle
Name and official title of owner/operator or authorized representative	Date	Telephone Number	Signature

Optional Attachments

☑ Site Plan
☐ Site Coordinate Abbreviations
☐ Other Safeguard measures

CLCM-EPCRA-OAK CREEK-Q25(b)-000010

EPA-R5-2018-002961_0000496

WISCONSIN 2016 EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Facility Name : MID-AMERICA STEEL DRUM CO., INC. ID : 78526

Reporting Period From January 1, 2016 to December 31, 2016

Reporting Exemption ☐ Exempt ☑ Not Exempt

Reason for Reporting Exemption (See Resources for definitions of Fee/Reporting Exemptions)

☐ a. This facility is not covered by the OSHA Hazard Communication Act and is not a private or public agency as defined by s. 323.60 (1)(h) and (i).

☐ b. Per OSHA Hazard Communication Act regulations, hazardous chemicals present at this facility are not required to have Material Safety Data Sheets prepared for them or available to the facility because of one or more of the eight reporting exemptions at CFR Chapter 29, Section 1910.1200(b). (See Resources link for eight OSHA Reporting Exemptions)

☐ c. Hazardous chemicals at this facility fall under one or more of the section 311(e) reporting exemptions. (See Resources for five 311(e) Reporting Exemptions)

☐ d. This is a Retail Gas Station and the higher reporting thresholds for gasoline and diesel fuel apply. (See Instructions in the Resources link)

Fee Exemption ☐ Exempt ☑ Not Exempt

Reason for Fee Exemption

☐ a. The operator of this facility had fewer than 10 full-time equivalent employees (20,080 hrs.) in the state of Wisconsin in 2016. There were a Total of 70 full-time equivalent employees.

☐ b. This is a Federal or federally recognized Tribal facility.

Partial Fee Exemption ☐ Exempt ☑ Not Exempt

Reason for Partial Fee Exemption (See Resources for definitions of Fee/Reporting Exemptions)

☐ a. Chemical is gasoline and/or diesel fuel present in reportable quantities and held for resale or retail at a petroleum marketing facility.

☐ b. Chemical is gasoline and/or diesel fuel at a retail gas station was stored in a tank(s) entirely underground, and 2) the facility was in compliance with all applicable Underground Storage program requirements at all times during the preceding calendar year, and 3) less than 75,000 gallons of gasoline and/or 100,000 gallons of diesel fuel were present any one time.

☐ c. Chemical is sand and/or gravel present in reportable quantities.

☐ d. Chemical is calcium chloride, sodium chloride and/or calcium magnesium acetate present in reportable quantities and used as a road deicing agent.

☐ e. Chemical is reported voluntarily and is not present in reportable quantities or exempt from reporting for Section 311(e) (MSDS/Chemical List), Section 312 (annual Tier Two Reporting), and the OSHA Hazard Communications Act regulations.

WISCONSIN 2016 EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Facility Name : MID-AMERICA STEEL DRUM CO., INC. ID : 78526

Reporting Period From January 1, 2016 to December 31, 2016

Chemical Description	Physical & Health Hazards	Inventory
Chemical ID : 457684 Chemical Information is changed from Last Submission : ☑ CAS : N/A Trade Secret : ☐ Chemical Name : SOLVENT BASED PAINTS EHS : ☐ Contains EHS : ☐ EHS Name : MSDS/SDS ☐ Pure ☑ Mix ☐ Solid ☑ Liquid ☐ Gas	☑ Fire ☐ Pressure ☐ Reactivity ☑ Immediate ☑ Delayed (Chronic)	10000 Max Daily Amt(lbs) 06 Max Daily Amount Code 6000 Ave. Daily Amount (lbs.) 05 Ave. Daily Amount Code 365 No of days on site

Storage Codes & Location

Container Type	Pressure	Temperature	Storage Location	Description	Max Amt At Location(lbs)
[D] STEEL DRUM	[1] AMBIENT PRESSURE	[4] AMBIENT TEMPERATURE	PAINT VAULTS AND AT PAINT BOOTHS	STEEL DRUMS	10000

Fee and/or Reporting Exemption

- ☐ Chemical is gasoline or diesel fuel, held for resale or retail.
- ☐ Chemical is gasoline and/or diesel fuel was stored in a tank(s) entirely underground.
- ☐ Chemical is sand and/or gravel.
- ☐ Chemical is calcium chloride, sodium chloride or calcium magnesium acetate used for deicing agent.
- ☐ Chemical is reported voluntarily.

Chemical Description	Physical & Health Hazards	Inventory
Chemical ID : 457685 Chemical Information is changed from Last Submission : ☑ CAS : N/A Trade Secret : ☐ Chemical Name : WATER BASED PAINTS EHS : ☐ Contains EHS : ☐ EHS Name : MSDS/SDS ☐ Pure ☑ Mix ☐ Solid ☑ Liquid ☐ Gas	☑ Fire ☐ Pressure ☐ Reactivity ☑ Immediate ☑ Delayed (Chronic)	25000 Max Daily Amt(lbs) 07 Max Daily Amount Code 12000 Ave. Daily Amount (lbs.) 06 Ave. Daily Amount Code 365 No of days on site

Storage Codes & Location

Container Type	Pressure	Temperature	Storage Location	Description	Max Amt At Location(lbs)
[D] STEEL DRUM	[1] AMBIENT PRESSURE	[4] AMBIENT TEMPERATURE	IN PAINT VAULTS AND AT PAINT BOOTHS	STEEL DRUMS	25000

Fee and/or Reporting Exemption

- ☐ Chemical is gasoline or diesel fuel, held for resale or retail.
- ☐ Chemical is gasoline and/or diesel fuel was stored in a tank(s) entirely underground.
- ☐ Chemical is sand and/or gravel.
- ☐ Chemical is calcium chloride, sodium chloride or calcium magnesium acetate used for deicing agent.
- ☐ Chemical is reported voluntarily.

Notes	
Notes entered by Company/Facility User	Re: Mid-America Steel Drum Co, Inc., FID #78526, no longer has sulfuric acid on site nor any other hazardous materials in a reportable quantity and, therefore, will not be submitting a report this year. The last day it had sulfuric acid on site was 6/1/2015. Richard Janard 1/26/16

Janard, Inc. *Environmental and OSHA Compliance Consultants*

P.O. Box 2011 * Brookfield, WI 53008-2011 * Ph: (262) 792-1150 * Fax: (262) 792-1152

March 8, 2017

Kevin Meyer, Plant Manager
MID-AMERICA STEEL DRUM CO., INC.
8570 South Chicago Road
Oak Creek, WI 53154

Dear Kevin:

Enclosed is a copy of your completed ***Revised*** **SARA Title III, Tier 2 report for year ending 2016.** On this revised copy I have added diesel fuel as a reportable substance and included an updated facility drawing to show the location of the diesel fuel storage tank as well as all locations for storage of paints.

Since the annual fee has already been paid there is no FEE STATEMENT with this revised submittal. This copy is for your files and, as always, if there are any questions or concerns please feel free to contact me at your convenience.

Very truly yours,
JANARD, INC.

Richard Lyle, President

WISCONSIN 2016 EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

PO Box 7978, Madison, WI 53707-7978
Phone: 608-242-3221

WISCONSIN EMERGENCY MANAGEMENT
DMA 1004 (R11-09) Wis. Stat 323.60

Reporting Period From January 1, 2016 to December 31, 2016

☐ Annual ☑ Revision ☑ Facility Information is changed from Last Submission

Facility Identification

ID	: 78526				
Name	: MID-AMERICA STEEL DRUM CO., INC.				
Street	: 8570 SOUTH CHICAGO ROAD	City	:	OAK CREEK	
State	: WI	Zip	:	53154	
County	: MILWAUKEE COUNTY				
LEPC Name	: Milwaukee County LEPC	Tribe	:	☐	
Lat/Long	: 42.8881604/-87.8624821	Fire Department	:	OAK CREEK FIRE DEPT	
Contact Name	: KEVIN MEYER	Phone	:	(414) 762-1114	
Fax	: (414) 762-1623	Email	:	kmeyer@masdinc.com	
Maximum Occupants	: 70	☑ Manned	☐ Unmanned		

SIC Code	: 3412	Dun & Brad No	: NA
NAICS	: 332439	TRIFID	: 53154MDMRC8570S

Subject to Emergency Planning under Section 302 of EPCRA (40 CFR part 355)? ☑ Yes ☐ No

Subject to Chemical Accident Prevention under Section 112(r) of CAA (40 CFR part 68, Risk Management Program)? RMP Facility ID : ☐ Yes ☑ No

Subject to Toxic Release Inventory under Section 313 of EPCRA (40 CFR part 372)? TRI Facility ID : 53154MDMRC8570S ☑ Yes ☐ No

Mailing Address if different from Facility ID Address

Company	: MID-AMERICA STEEL DRUM CO., INC.	Attn	: KEVIN MEYER
Street Address 1	: 8570 SOUTH CHICAGO ROAD	Street Address 2	:
City	: OAK CREEK	State	: WI
Zip	: 53154	Phone	: (414) 762-1114
Country	: United States		

Owner/Operator Details

Name	: MID AMERICA STEEL DRUM CO. INC.		
Address	: 8570 SOUTH CHICAGO ROAD OAK CREEK, WI 53154 United States		
Phone	: (414) 762-1114	Email	: kmeyer@masdinc.com

Parent Company Details

Name	: MID-AMERICA STEEL DRUM CO., INC.		
Address	: 8570 SOUTH CHICAGO ROAD OAK CREEK, WI 53154 United States		
Phone	: (414) 762-1114	Email	: kmeyer@masdinc.com
Dun and Brad No	: NA		

Facility Emergency Coordinator

Name	: KEVIN MEYER	Title	: PLANT MANAGER
Phone	: (414) 762-1114	24 Hr. Phone	: (414) 235-0277
Email	: kmeyer@midamericasteeldrum.com		

Tier II Information Contact

Name	: KEVIN MEYER	Title	: PLANT MANAGER
Phone	: (414) 762-1114	24 Hr. Phone	: (414) 235-0277
Email	: KMEYER@MASDINC.COM		

Emergency Contacts

Sl.No	Name	Title	Phone	24 Hr.Phone	Email
1	KEVIN MEYER	PLANT MANAGER	(414) 762-1114	(414) 235-0277	kmeyer@midamericasteeldrum.com
2	LARRY PALKOWSKI	Maintenance Supervisor	(414) 762-1114	(414) 235-0287	larryp@masdinc.com

Certification: I certify under penalty of law that I have personally examined and am familiar with the information submitted, and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Richard Lyle, Consultant, Janard, Inc.	3/8/2017 9:12 AM	(414) 303-4712	Richard Lyle
Name and official title of owner/operator or authorized representative	Date	Telephone Number	Signature

Optional Attachments

☑ Site Plan
☐ Site Coordinate Abbreviations
☐ Other Safeguard measures

WISCONSIN 2016 EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Facility Name : MID-AMERICA STEEL DRUM CO., INC. ID : 78526

Reporting Period From January 1, 2016 to December 31, 2016

Reporting Exemption ☐ Exempt ☑ Not Exempt

Reason for Reporting Exemption (See Resources for definitions of Fee/Reporting Exemptions)

☐ a. This facility is not covered by the OSHA Hazard Communication Act and is not a private or public agency as defined by s. 323.60 (1)(h) and (i).

☐ b. Per OSHA Hazard Communication Act regulations, hazardous chemicals present at this facility are not required to have Material Safety Data Sheets prepared for them or available to the facility because of one or more of the eight reporting exemptions at CFR Chapter 29, Section 1910.1200(b). (See Resources link for eight OSHA Reporting Exemptions)

☐ c. Hazardous chemicals at this facility fall under one or more of the section 311(e) reporting exemptions. (See Resources for five 311(e) Reporting Exemptions)

☐ d. This is a Retail Gas Station and the higher reporting thresholds for gasoline and diesel fuel apply. (See Instructions in the Resources link)

Fee Exemption ☐ Exempt ☑ Not Exempt

Reason for Fee Exemption

☐ a. The operator of this facility had fewer than 10 full-time equivalent employees (20,080 hrs.) in the state of Wisconsin in 2016. There were a Total of 70 full-time equivalent employees.

☐ b. This is a Federal or federally recognized Tribal facility.

Partial Fee Exemption ☐ Exempt ☑ Not Exempt

Reason for Partial Fee Exemption (See Resources for definitions of Fee/Reporting Exemptions)

☐ a. Chemical is gasoline and/or diesel fuel present in reportable quantities and held for resale or retail at a petroleum marketing facility.

☐ b. Chemical is gasoline and/or diesel fuel at a retail gas station was stored in a tank(s) entirely underground, and 2) the facility was in compliance with all applicable Underground Storage program requirements at all times during the preceding calendar year, and 3) less than 75,000 gallons of gasoline and/or 100,000 gallons of diesel fuel were present any one time.

☐ c. Chemical is sand and/or gravel present in reportable quantities.

☐ d. Chemical is calcium chloride, sodium chloride and/or calcium magnesium acetate present in reportable quantities and used as a road deicing agent.

☐ e. Chemical is reported voluntarily and is not present in reportable quantities or exempt from reporting for Section 311(e) (MSDS/Chemical List), Section 312 (annual Tier Two Reporting), and the OSHA Hazard Communications Act regulations.

WISCONSIN 2016 EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Facility Name : MID-AMERICA STEEL DRUM CO., INC. ID : 78526

Reporting Period From January 1, 2016 to December 31, 2016

Chemical Description

Chemical ID : 456651
Chemical Information is changed from Last Submission : ☑
CAS : 68476346
Trade Secret : ☐
Chemical Name : DIESEL FUEL
EHS : ☐ Contains EHS : ☐
EHS Name : MSDS/SDS
☑ Pure ☐ Mix ☐ Solid ☑ Liquid ☐ Gas

Physical & Health Hazards

☑ Fire
☐ Pressure
☐ Reactivity
☑ Immediate
☑ Delayed (Chronic)

Inventory

27600	Max Daily Amt(lbs)
07	Max Daily Amount Code
19000	Ave. Daily Amount (lbs.)
06	Ave. Daily Amount Code
365	No of days on site

Storage Codes & Location

Container Type	Pressure	Temperature	Storage Location	Description	Max Amt At Location(lbs)
[4] ABOVE GROUND TANK	[1] AMBIENT PRESSURE	[1] AMBIENT TEMPERATURE	PARKING LOT 120 FEET WEST OF OFFICE BUILDING	ABOVE GROUND TANK	27600

Fee and/or Reporting Exemption

☐ Chemical is gasoline or diesel fuel, held for resale or retail.
☐ Chemical is gasoline and/or diesel fuel was stored in a tank(s) entirely underground.
☐ Chemical is sand and/or gravel.
☐ Chemical is calcium chloride, sodium chloride or calcium magnesium acetate used for deicing agent.
☐ Chemical is reported voluntarily.

Chemical Description

Chemical ID : 457684
Chemical Information is changed from Last Submission : ☐
CAS : N/A
Trade Secret : ☐
Chemical Name : SOLVENT BASED PAINTS
EHS : ☐ Contains EHS : ☐
EHS Name : MSDS/SDS
☐ Pure ☑ Mix ☐ Solid ☑ Liquid ☐ Gas

Physical & Health Hazards

☑ Fire
☐ Pressure
☐ Reactivity
☑ Immediate
☑ Delayed (Chronic)

Inventory

10000	Max Daily Amt(lbs)
06	Max Daily Amount Code
8000	Ave. Daily Amount (lbs.)
05	Ave. Daily Amount Code
365	No of days on site

Storage Codes & Location

Container Type	Pressure	Temperature	Storage Location	Description	Max Amt At Location(lbs)
[5] STEEL DRUM	[1] AMBIENT PRESSURE	[1] AMBIENT TEMPERATURE	PAINT VAULTS AND AT PAINT BOOTHS	STEEL DRUMS	10000

Fee and/or Reporting Exemption

- ☐ Chemical is gasoline or diesel fuel, held for resale or retail.
- ☐ Chemical is gasoline and/or diesel fuel was stored in a tank(s) entirely underground.
- ☐ Chemical is sand and/or gravel.
- ☐ Chemical is calcium chloride, sodium chloride or calcium magnesium acetate used for deicing agent.
- ☐ Chemical is reported voluntarily.

Chemical Description

Chemical ID : 467685
Chemical Information is changed from Last Submission : ☐
CAS : N/A
Trade Secret : ☐
Chemical Name : WATER BASED PAINTS
EHS : ☐ Contains EHS : ☐
EHS Name :
MSDS/SDS
☐ Pure ☑ Mix ☐ Solid ☑ Liquid ☐ Gas

Physical & Health Hazards

- ☑ Fire
- ☐ Pressure
- ☐ Reactivity
- ☑ Immediate
- ☑ Delayed (Chronic)

Inventory

25000	Max Daily Amt(lbs)
07	Max Daily Amount Code
12000	Ave. Daily Amount (lbs.)
06	Ave. Daily Amount Code
365	No of days on site

Storage Codes & Location

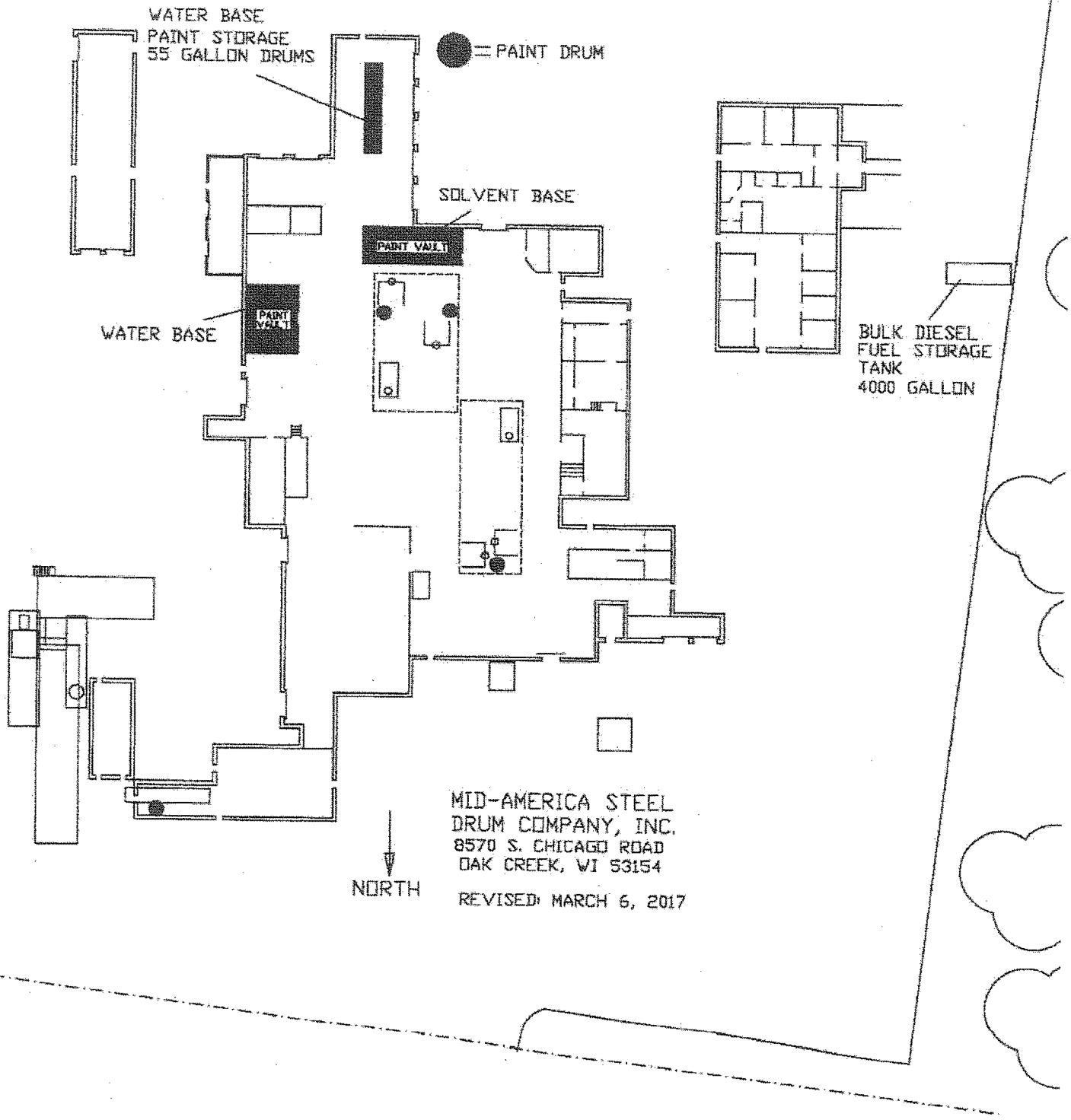
Container Type	Pressure	Temperature	Storage Location	Description	Max Amt At Location(lbs)
[D] STEEL DRUM	[1] AMBIENT PRESSURE	[4] AMBIENT TEMPERATURE	IN PAINT VAULTS AND AT PAINT BOOTHS	STEEL DRUMS	25000

Fee and/or Reporting Exemption

- ☐ Chemical is gasoline or diesel fuel, held for resale or retail.
- ☐ Chemical is gasoline and/or diesel fuel was stored in a tank(s) entirely underground.
- ☐ Chemical is sand and/or gravel.
- ☐ Chemical is calcium chloride, sodium chloride or calcium magnesium acetate used for deicing agent.
- ☐ Chemical is reported voluntarily.

Notes	
Notes entered by Company/Facility User	Re: Mid-America Steel Drum Co, Inc., FID #78526, no longer has sulfuric acid on site nor any other hazardous materials in a reportable quantity and, therefore, will not be submitting a report this year. The last day it had sulfuric acid on site was 6/1/2015. Richard Janard 1/26/16

HAZARDOUS MATERIAL LOCATIONS



SAFETY DATA SHEET

SULFURIC ACID 66 DEG.
Product ID: AC006600
Revised: 02-14-2014
Replaces: 10-12-2009

1. IDENTIFICATION

Product Name:	SULFURIC ACID 66 DEG.
Synonyms:	Sulfuric acid; Oil of vitriol; Hydrogen sulfate
CAS Number:	MIXTURE
Recommended Use:	No data available.
Restrictions on Use:	No data available.

Hydrite Chemical Co.
300 N. Patrick Blvd.
Brookfield, WI 53008-0948
(262) 792-1450

EMERGENCY RESPONSE NUMBERS:
24 Hour Emergency #: (414) 277-1311
CHEMTREC Emergency #: (800) 424-9300

2. HAZARD(S) IDENTIFICATION

Signal Word: Danger

GHS Classification:
Substance or mixture corrosive to metals Category 1
Skin Corrosion/Irritation Category 1A
Serious Eye Damage/Eye Irritation Category 1
Carcinogenicity Category 1A
Acute Toxicity - Inhalation Vapour Category 2
Specific Target Organ Systemic Toxicity (STOT) - Repeated Exposure Category 2
Acute Toxicity - Inhalation Dust / Mist Category 3

Hazard Statements:
May be corrosive to metals.
Causes severe skin burns and eye damage.
Fatal if inhaled.
Toxic if inhaled.
May cause cancer.
May cause damage to organs (teeth, respiratory system) through prolonged or repeated exposure (by inhalation).

Precautionary Statements:

Prevention:
Obtain special instructions before use.
Do not handle until all safety precautions have been read and understood.
Keep only in original container.
Do not breathe dust, fume, gas, mist, vapours or spray.
Wash thoroughly after handling.
Use only outdoors or in a well-ventilated area.
Wear gloves, eye and face protection and protective clothing.
Wear respiratory protection.

Response:
IF SWALLOWED: Rinse mouth. Do NOT induce vomiting.

IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water.
IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing.
IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
Immediately call a POISON CENTER or doctor/physician.
Specific treatment is urgent (see First Aid on SDS or on this label).
Wash contaminated clothing before reuse.
Absorb spillage to prevent material damage.

Storage: Store in a well-ventilated place. Keep container tightly closed.
Store in a secure manner.
Store in corrosive resistant container with a resistant inner liner.

Disposal: Dispose of in accordance with local, regional and international regulations.

Hazards Not Otherwise Classified: None known.

Percentage of Components with Unknown Acute Toxicity:
Dermal: 93.2 %

3. COMPOSITION/INFORMATION ON INGREDIENTS

Component	CAS Number	% by Wt.
Sulfuric Acid	7664-93-9	93.19 %

4. FIRST-AID MEASURES

Eye Contact: Immediately flush eyes with plenty of water for at least 15 minutes while holding eyelids open. Tilt head to avoid contaminating unaffected eye. Get immediate medical attention.

Skin Contact: Immediately flush skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Get medical attention immediately. Do not reuse clothing and shoes until cleaned. Discard contaminated leather articles such as shoes and belt. Do not apply oils or ointments unless ordered by the physician.

Inhalation: Remove to fresh air. If breathing is difficult, administer oxygen. If not breathing, give artificial respiration, preferably mouth-to-mouth. GET MEDICAL ATTENTION IMMEDIATELY.

Ingestion: If fully conscious, drink a quart of water. DO NOT induce vomiting. CALL A PHYSICIAN IMMEDIATELY. If unconscious or in convulsions, take immediately to a hospital or a physician. NEVER induce vomiting or give anything by mouth to an unconscious victim. If vomiting occurs spontaneously, keep head below hips to prevent aspiration of liquid into the lungs.

Note to Physicians:
This product contains materials that may cause severe pneumonitis if aspirated. If ingestion has occurred less than 2 hours earlier, carry out careful gastric lavage; use endotracheal cuff if available, to prevent aspiration. Observe patient for respiratory difficulty from aspiration pneumonitis. Give artifical resuscitation and appropriate chemotherapy if respiration is depressed. Following exposure the patient should be kept under medical review for at least 48 hours as delayed pneumonitis may occur. DO NOT attempt to neutralize the acid with weak bases since the reaction will produce heat that may extend the corrosive injury.

Most Important Symptoms/Effects:

Eye Contact: CORROSIVE-Causes severe irritation and burns. May cause: blurred vision. redness. pain. conjunctivitis. ulcerations. tissue destruction. permanent eye damage. blindness.

Skin Contact: CORROSIVE-Causes severe irritation and burns. Concentrated solutions may cause: severe burns. severe necrosis. permanent skin damage. Prolonged and repeated exposure to dilute solutions may cause irritation, redness, pain and drying and cracking of the skin.

Skin Absorption: No data available.

Inhalation: CORROSIVE-Causes severe irritation and burns. Vapors or mists may damage: mucous membranes. respiratory tract. Vapors or mists may cause: coughing. sore throat. shortness of breath. labored breathing. choking. bronchospasms. chemical pneumonitis. pulmonary edema. death. Effects may be delayed. Chronic exposure may cause: dental erosions. discoloration of teeth. bronchitis. bronchial emphysema.

Ingestion: CORROSIVE-Causes severe irritation and burns. May cause damage to the: mouth. throat. esophagus. stomach. gastrointestinal tract. May cause: pain. vomiting. diarrhea. bleeding. labored breathing. burns or perforation of the gastrointestinal tract leading to ulceration and secondary infection. death. Effects may be delayed. Aspiration into the lungs may cause chemical pneumonia and lung damage.

5. FIRE-FIGHTING MEASURES

Extinguishing Media: Carbon dioxide. Dry chemical. Foam.

Fire Fighting Methods: Evacuate area of unprotected personnel. Wear protective clothing including NIOSH-approved self-contained breathing apparatus. Remain upwind of fire to avoid hazardous vapors and decomposition products. Use water spray to cool fire-exposed containers. Do not get water inside containers. Product generates heat upon addition of water, with possible spattering. Neutralize run-off with Lime, Soda Ash, etc., to prevent corrosion of metals and formation of Hydrogen gas. Run-off from fire control may cause pollution.

Fire and Explosion Hazards: Product may react with some metals (ex.: Aluminum, Zinc, Tin, etc.) to release flammable hydrogen gas. Will react with organic materials with evolution of heat and sulfur dioxide. Concentrated acid is a strong oxidizing agent. May cause ignition of combustible materials on contact with generation of sulfur dioxide fumes.

Hazardous Combustion Products: Sulfur oxides.

6. ACCIDENTAL RELEASE MEASURES

Spill Clean-Up Procedures: CORROSIVE MATERIAL. Evacuate unprotected personnel from area. Maintain adequate ventilation. Follow personal protective equipment recommendations found in Section 8. Never exceed any occupational exposure limit. Contain spill, place into drums for proper disposal. Flush remaining area with water and neutralize with Soda Ash or Lime and dispose of properly. Avoid direct discharge to sewers and surface waters. Notify authorities if entry occurs.

7. HANDLING AND STORAGE

Handling: Avoid contact with eyes, skin, and clothing. Use with adequate ventilation. Do not swallow. Avoid breathing vapors, mists, or dust. Do not eat, drink, or smoke in work area. Wash thoroughly after handling. Empty containers retain product residue (vapor, dust, or liquid) and can be dangerous. DO NOT pressurize, cut, weld, braze, solder, drill, grind, or expose such containers to heat, flame, sparks, static electricity, or other source of ignition. They may explode and cause injury or death. Ground lines and equipment used during transfer to reduce the possibility of static spark-initiated fire or explosion. Use non-sparking tools.

Storage: CORROSIVE MATERIAL. Store in a cool, well ventilated area, out of direct sunlight. Store in a dry location away from heat. Keep away from incompatible materials. Keep containers tightly closed. Do not store in unlabeled or mislabeled containers. Do not freeze. Highly corrosive to most metals with evolution of hydrogen gas. Explosive/flammable concentrations of hydrogen gas may accumulate inside metal containers. Elevated temperatures will increase the corrosion rate of most metals. See Section 10 for incompatible materials.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

OSHA Exposure Guidelines:

Component	Limits
Sulfuric Acid	1 mg/m3 TWA

ACGIH Exposure Guidelines:

Component	Limits

Sulfuric Acid	0.2 mg/m3 TWA (thoracic fraction)

Engineering Controls: Local exhaust ventilation, process enclosures, or other engineering controls are required when handling or using this product to avoid overexposure. Maintain adequate ventilation. Do not use in closed or confined spaces. Avoid creating dust or mist. Keep levels below exposure limits. To determine exposure levels, monitoring should be performed regularly.

Eye/Face Protection: Wear chemical safety goggles and a full face shield while handling this product. Do not wear contact lenses.

Skin Protection: Prevent contact with this product. Wear gloves and protective clothing depending on condition of use. Protective gloves: Acid-proof. Chemical-resistant. Impervious.

Respiratory Protection: Respiratory protection must be worn if ventilation does not eliminate symptoms or keep levels below recommended exposure limits. If exposure limits are exceeded, wear: NIOSH-Approved air-purifying respirator with: Acid gas cartridge and Dust/mist filter. NIOSH-Approved positive pressure supplied air respirator. NIOSH-Approved self-contained breathing apparatus. DO NOT exceed limits established by the respirator manufacturer. All respiratory protection programs must comply with OSHA 29 CFR 1910.134 and ANSI Z88.2 requirements and must be followed whenever workplace conditions require a respirator's use.

Other Protective Equipment: Eye-wash station. Safety shower. Rubber apron. Chemical safety shoes. Rubber boots. Protective clothing. Full-rubber acid suit.

General Hygiene Conditions: Wash with soap and water before meal times and at the end of each work shift. Food, beverages, and tobacco products should not be carried, stored or consumed where this material is in use.

9. PHYSICAL AND CHEMICAL PROPERTIES

Physical State: Oily liquid.
Color: Clear to cloudy. Colorless to amber.
Odor: Odorless to pungent.
Odor Threshold: N.D.
pH: < 1.00
Freezing Point (deg. F): ~ -21
Melting Point (deg. F): N.A.
Initial Boiling Point or Boiling Range: ~ 529 °F
Flash Point: N.A.
Flash Point Method: N.A.
Evaporation Rate (nBuAc = 1): <1
Flammability (solid, gas): N.D.
Lower Explosion Limit: N.A.
Upper Explosion Limit: N.A.
Vapor Pressure (mm Hg): 0.0016 @102F
Vapor Density (air=1): 3.4 (H_2SO_4)
Specific Gravity or Relative Density: 1.835 @25C
Solubility in Water: Complete
Partition Coefficient (n-octanol/water): N.D.
Autoignition Temperature: No Data
Decomposition Temperature: N.D.
Viscosity: N.D.
% Volatile (wt%): N.D.
VOC (wt%): 0
VOC (lbs/gal): 0
Fire Point: N.D.

10. STABILITY AND REACTIVITY

Reactivity: No data available.

Chemical Stability: Stable under normal conditions.

Possibility of Hazardous Reactions: Hazardous polymerization will not occur under normal conditions. May react with certain metals to produce flammable hydrogen gas. Hazardous gases are evolved on contact with chemicals such as cyanides, sulfides, carbides, etc.

Conditions to Avoid: Avoid contact with heat, sparks, electric arcs, other hot surfaces, and open flames. Contact with organic materials may cause fire and explosions. Contact with water may cause violent reaction with evolution of heat. To dilute: Add product slowly to lukewarm water; not water to product.

Incompatible Materials: Metals. Water. Alkalies. Strong oxidizing agents. Reducing agents. Carbonates. Cyanides. Sulfides. Carbides. Chlorates. Fulminates. Nitrates. Powdered metals. Organic materials. Combustible materials. Nitrogen compounds. Picrates. Bases. Halogens. Alkali metals. and many other reactive substances.

Hazardous Decomposition Products: Sulfur oxides. Sulfuric acid vapors. Hydrogen gas.

11. TOXICOLOGICAL INFORMATION

Component	Oral LD50	Dermal LD50	Inhalation LC50
Sulfuric Acid	Rat: 2140 mg/kg	No Data	2H Rat: 510.0 mg/m3

Acute Toxicity Estimate (ATE):
Inhalation Vapor: 0.5473 mg/L
Inhalation Dust/Mist: 0.5473 mg/L

Routes of Exposure: Eyes. Ingestion. Inhalation. Skin.

Eye Contact: CORROSIVE-Causes severe irritation and burns. May cause: blurred vision. redness. pain. conjunctivitis. ulcerations. tissue destruction. permanent eye damage. blindness.

Skin Contact: CORROSIVE-Causes severe irritation and burns. Concentrated solutions may cause: severe burns. severe necrosis. permanent skin damage. Prolonged and repeated exposure to dilute solutions may cause irritation, redness, pain and drying and cracking of the skin.

Skin Absorption: No data available.

Inhalation: CORROSIVE-Causes severe irritation and burns. Vapors or mists may damage: mucous membranes. respiratory tract. Vapors or mists may cause: coughing. sore throat. shortness of breath. labored breathing. choking. bronchospasms. chemical pneumonitis. pulmonary edema. death. Effects may be delayed. Chronic exposure may cause: dental erosions. discoloration of teeth. bronchitis. bronchial emphysema.

Ingestion: CORROSIVE-Causes severe irritation and burns. May cause damage to the: mouth. throat. esophagus. stomach. gastrointestinal tract. May cause: pain. vomiting. diarrhea. bleeding. labored breathing. burns or perforation of the gastrointestinal tract leading to ulceration and secondary infection. death. Effects may be delayed. Aspiration into the lungs may cause chemical pneumonia and lung damage.

Medical Conditions Aggravated by Exposure to Product: Eye disorders. Skin disorders. Respiratory system disorders.

Other: Circulatory collapse with clammy skin, weak and rapid pulse, shallow respirations, and scanty urine may follow skin contact or ingestion. Circulatory shock is often the immediate cause of death. The International Agency for Research on Cancer (IARC) has concluded that occupational exposure to strong inorganic acid mists containing sulfuric acid is carcinogenic to man, causing cancer of the larynx (the voice box). Although no direct link has been established between exposure to sulfuric acid itself, and cancer in man, exposure to any mist or aerosol during the use of this product should be avoided.

Cancer Information:
This product contains 0.1% or more of the following chemicals listed by NTP, IARC or OSHA as known or possible carcinogens:
Sulfuric acid mist

12. ECOLOGICAL INFORMATION

Ecotoxicological Information: No data available.

Chemical Fate Information: No data available.

13. DISPOSAL CONSIDERATIONS

Hazardous Waste Number: D002
Disposal Method: Dispose of in a permitted hazardous waste management facility following all local, state and federal regulations. Since emptied containers retain product residue, follow label warnings even after container is emptied. DO NOT pressurize, cut, weld, solder, drill, grind or expose empty containers to heat, flame, sparks or other sources of ignition.

14. TRANSPORT INFORMATION

DOT (Department of Transportation):

Identification Number:	UN1830
Proper Shipping Name:	SULFURIC ACID
Hazard Class:	8
Packing Group:	II
Label Required:	CORROSIVE
Reportable Quantity (RQ):	1000# (Sulfuric Acid)

15. REGULATORY INFORMATION

TSCA Inventory Status: All components of this product are on the TSCA Inventory or are exempt from TSCA Inventory requirements.

SARA Title III Section 311/312 Category Hazards:

Immediate (Acute)	Delayed (Chronic)	Fire Hazard	Pressure Release	Reactive
Yes	Yes	No	No	Yes

Regulated Components: Component	CAS Number	CERCLA RQ	SARA EHS	SARA 313	U.S. HAP	WI HAP	Prop 65
Sulfuric Acid	7664-93-9	Yes	Yes	Yes	No	Yes	Yes

Note: * Sulfuric acid appears on the Section 313 List. However, the listing only applies to the aerosol forms of sulfuric acid.

16. OTHER INFORMATION

Hazard Rating System
Health: 3*
Flammability: 0
Reactivity: 2
* = Chronic Health Hazard

NFPA Rating System
Health: 3
Flammability: 0
Reactivity: 2
Special Hazard: W

MSDS Abbreviations
N.A. = Not Applicable
N.D. = Not Determined
HAP = Hazardous Air Pollutant
VOC = Volatile Organic Compound
C = Ceiling Limit
N.E./Not Estab. = Not Established

SULFURIC ACID 66 DEG.
Product ID: AC006600

MSDS Prepared by: CSH

Reason for Revision: New format. Changes made throughout the MSDS.

Revised: 02-14-2014
Replaces: 10-12-2009

The data in this Material Safety Data Sheet relates to the specific material designated and does not relate to its use in combination with any other material or process. The data contained is believed to be correct. However, since conditions of use are outside our control it should not be taken as warranty or representation for which HYDRITE CHEMICAL CO. assumes legal responsibility. This information is provided solely for your consideration, investigation, and verification.

SAFETY DATA SHEET

Issuing Date: 22-Dec-2011 **Revision Date:** 21-Nov-2014 **Revision Number:** 1

1. IDENTIFICATION OF THE SUBSTANCE/PREPARATION AND OF THE COMPANY/UNDERTAKING

Product Code: 106R350
Hentzen Coatings, Inc.
6937 West Mill Road, Milwaukee, WI 53218-1225

Product Name: 3.50 VOC RED STERILKOTE 300
Company Phone Number: 1-414-353-4200
Emergency telephone number ChemTrec 1-800-424-9300

Recommended use of the chemical and restrictions on use Industrial paint (Paint or Paint-Related), Restricted to professional users

2. HAZARDS IDENTIFICATION

Classification

OSHA Regulatory Status
This chemical is considered hazardous by the 2012 OSHA Hazard Communication Standard (29 CFR 1910.1200)

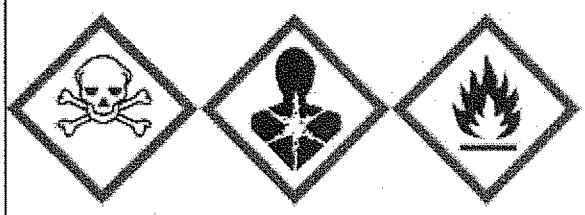
Acute toxicity - Oral	Category 4
Acute toxicity - Dermal	Category 3
Skin Corrosion/Irritation	Category 2 Sub-category B
Serious eye damage/eye irritation	Category 2
Germ Cell Mutagenicity	Category 1B
Carcinogenicity	Category 1B
Specific target organ toxicity (single exposure)	Category 3
Flammable Liquids	Category 1

Label Elements

Emergency Overview

DANGER

Hazard Statements
Harmful if swallowed
Toxic in contact with skin
Causes skin irritation
Causes serious eye irritation
May cause genetic defects
May cause cancer
May cause respiratory irritation. May cause drowsiness or dizziness
Extremely flammable liquid and vapor



Appearance Opaque **Physical state** Liquid **Odor** Solvent

Precautionary Statements - Prevention
Obtain special instructions before use
Do not handle until all safety precautions have been read and understood
Use personal protective equipment as required
Wash face, hands and any exposed skin thoroughly after handling
Do not eat, drink or smoke when using this product
Do not breathe dust/fume/gas/mist/vapors/spray
Wear eye/face protection
Use only outdoors or in a well-ventilated area
Keep away from heat/sparks/open flames/hot surfaces. - No smoking
Keep container tightly closed
Ground/Bond container and receiving equipment
Use explosion-proof electrical/ ventilating/ lighting/ equipment
Use only non-sparking tools
Take precautionary measures against static discharge
Keep cool

Precautionary Statements - Response
Immediately call a POISON CENTER or doctor/physician
IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing
If eye irritation persists: Get medical advice/attention
Call a POISON CENTER or doctor/physician if you feel unwell
Wash contaminated clothing before reuse
IF ON SKIN (or hair): Remove/Take off immediately all contaminated clothing. Rinse skin with water/shower
If skin irritation occurs: Get medical advice/attention
IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing
Immediately call a POISON CENTER or doctor/physician
Call a POISON CENTER or doctor/physician if you feel unwell
IF SWALLOWED: Call a POISON CENTER or doctor/physician if you feel unwell
Rinse mouth
Do NOT induce vomiting
In case of fire: Use CO2, dry chemical, or foam for extinction

Precautionary Statements - Storage
Store locked up
Store in a well-ventilated place. Keep container tightly closed

Precautionary Statements - Disposal
Dispose of contents/container to an approved waste disposal plant

Hazards not otherwise classified (HNOC)
Other information
• May be harmful if swallowed
• Causes mild skin irritation

3. COMPOSITION/INFORMATION ON INGREDIENTS

Contains a known or suspected carcinogen

This product contains substances regulated as hazardous air pollutants (HAPS) under Section 112 of the Clean Air Act Amendments of 1990. See Section 15 for list of HAPS.

Chemical Name	CAS No	Weight-%	ACGIH	OSHA
ACETONE	67-64-1	20% - 30%	STEL: 750 ppm TWA: 500 ppm	TWA: 1000 ppm TWA: 2400 mg/m³
ETHYLENE GLYCOL BUTYL ETHER	111-76-2	10% - 20%	TWA: 20 ppm	TWA: 50 ppm TWA: 240 mg/m³ S*
PROPYLENE CARBONATE	108-32-7	10% - 20%	N/A	N/A

IRON OXIDE	1309-37-1	10% - 20%	TWA: 5 mg/m³ respirable fraction	TWA: 10 mg/m³ fume TWA: 15 mg/m³ total dust TWA: 5 mg/m³ respirable fraction
PHOSPHORIC ACID	7664-38-2	0% - 1%	STEL: 3 mg/m³ TWA: 1 mg/m³	TWA: 1 mg/m³
BUTYL ACETATE	123-86-4	0% - 1%	STEL: 200 ppm TWA: 150 ppm	TWA: 150 ppm TWA: 710 mg/m³
NAPHTHA, PETROLEUM, HEAVY ALKYLATE	64741-65-7	0% - 1%	N/A	N/A
XYLENE(PURE)	1330-20-7	0% - 1%	STEL: 150 ppm TWA: 100 ppm	TWA: 100 ppm TWA: 435 mg/m³
DIACETONE ALCOHOL	123-42-2	0% - 1%	TWA: 50 ppm	TWA: 50 ppm TWA: 240 mg/m³
ETHYL ALCOHOL	64-17-5	0% - 1%	STEL: 1000 ppm	TWA: 1000 ppm TWA: 1900 mg/m³
CARBON BLACK, AMORPHOUS	1333-86-4	0% - 1%	TWA: 3 mg/m³ inhalable fraction	TWA: 3.5 mg/m³
PROPYLENE OXIDE	75-56-9	0% - 1%	TWA: 2 ppm	TWA: 100 ppm TWA: 240 mg/m³
ETHYLBENZENE	100-41-4	0% - 1%	TWA: 20 ppm	TWA: 100 ppm TWA: 435 mg/m³
PHENOL	108-95-2	0% - 1%	TWA: 5 ppm S*	TWA: 5 ppm TWA: 19 mg/m³ S*
METHANOL	67-56-1	0% - 1%	STEL: 250 ppm TWA: 200 ppm S*	TWA: 200 ppm TWA: 260 mg/m³
TOLUENE	108-88-3	0% - 1%	TWA: 20 ppm	TWA: 200 ppm Ceiling: 300 ppm
FORMALDEHYDE	50-00-0	0% - 1%	Ceiling: 0.3 ppm	TWA: 0.75 ppm STEL: 2 ppm see 29 CFR 1910.1048
BENZENE	71-43-2	0% - 1%	STEL: 2.5 ppm TWA: 0.5 ppm S*	TWA: 10 ppm applies to industry segments exempt from the benzene standard at 29 CFR 1910.1028 TWA: 1 ppm Ceiling: 25 ppm STEL: 5 ppm see 29 CFR 1910.1028

4. FIRST AID MEASURES

First Aid Measures

General advice

Show this safety data sheet to the doctor in attendance. If symptoms persist, call a physician.

Eye Contact

Rinse immediately with plenty of water, also under the eyelids, for at least 15 minutes. If symptoms persist, call a physician. Immediately flush eyes with water for at least 15 minutes. Get medical attention. If easy to do, remove contact lenses. Keep eye wide open while rinsing.

Skin Contact

Remove and wash contaminated clothing and gloves, including the inside, before re-use. If skin irritation persists, call a physician. Immediate medical attention is not required. Wash off immediately with soap and plenty of water while removing all contaminated clothes and shoes.

Inhalation

If symptoms persist, call a physician. Remove to fresh air. Immediate medical attention is not required. Move to fresh air in case of accidental inhalation of vapors.

Ingestion Immediate medical attention is not required. Do NOT induce vomiting. Rinse mouth. Drink plenty of water. Clean mouth with water and afterwards drink plenty of water. Never give anything by mouth to an unconscious person. Consult a physician if necessary.

Self-protection of the first aider Remove all sources of ignition. Use personal protective equipment as required.

Most important symptoms and effects, both acute and delayed

Most Important Symptoms and Effects No information available.

Indication of any immediate medical attention and special treatment needed

Notes to physician Treat symptomatically.

5. FIRE-FIGHTING MEASURES

Suitable Extinguishing Media
Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.

Unsuitable Extinguishing Media No information available.

Specific hazards arising from the chemical
Extremely flammable. Flash back possible over considerable distance.

Explosion Data
Sensitivity to Mechanical Impact no data available.
Sensitivity to Static Discharge Yes.

Protective equipment and precautions for firefighters
As in any fire, wear self-contained breathing apparatus pressure-demand, MSHA/NIOSH (approved or equivalent) and full protective gear.

6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures

Personal Precautions Remove all sources of ignition. Evacuate personnel to safe areas. Ensure adequate ventilation. Take precautionary measures against static discharges. Use personal protective equipment as required. Keep people away from and upwind of spill/leak. Avoid breathing vapors or mists. Ventilate the area.

Environmental Precautions

Environmental Precautions Prevent further leakage or spillage if safe to do so. Prevent product from entering drains. Do not flush into surface water or sanitary sewer system. Vapors are heavier than air, spread along floors and form explosive mixtures with air.

Methods and materials for containment and cleaning up

Methods for Containment Prevent further leakage or spillage if safe to do so.

Methods for Cleaning Up Pick up and transfer to properly labeled containers. Dam up. Soak up with inert absorbent material (e.g. sand, silica gel, acid binder, universal binder, sawdust). Soak up with inert absorbent material.

7. HANDLING AND STORAGE

Precautions for safe handling

Advice on safe handling

Ensure adequate ventilation. Take necessary action to avoid static electricity discharge (which might cause ignition of organic vapors). Keep away from open flames, hot surfaces and sources of ignition. Take precautionary measures against static discharges. Use explosion-proof electrical (ventilation and lighting) equipment. Take necessary action to avoid static electricity discharge (which might cause ignition of organic vapors). Use with local exhaust ventilation. Wear protective gloves/protective clothing/eye protection/face protection. Do not breathe vapor or mist. Avoid contact with eyes. To dissipate static electricity during transfer, ground drum and connect to receiving container with bonding strap. Use only non-sparking tools.

Conditions for safe storage, including any incompatibilities

Storage Conditions

Keep tightly closed in a dry and cool place. Keep in properly labeled containers. Keep in an area equipped with sprinklers. Keep containers tightly closed in a cool, well-ventilated place. Keep away from heat, sparks and flame.

Incompatible Products

None known based on information supplied.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Control parameters

Exposure Guidelines

Chemical Name	ACGIH	OSHA	NIOSH IDLH
ACETONE 67-64-1	STEL: 750 ppm TWA: 500 ppm	TWA: 1000 ppm TWA: 2400 mg/m³	IDLH: 2500 ppm TWA: 250 ppm TWA: 590 mg/m³
ETHYLENE GLYCOL BUTYL ETHER 111-76-2	TWA: 20 ppm	TWA: 50 ppm TWA: 240 mg/m³ S*	IDLH: 700 ppm TWA: 5 ppm TWA: 24 mg/m³
IRON OXIDE 1309-37-1	TWA: 5 mg/m³ respirable fraction	TWA: 10 mg/m³ fume TWA: 15 mg/m³ total dust TWA: 5 mg/m³ respirable fraction	IDLH: 2500 mg/m³ Fe dust and fume TWA: 5 mg/m³ Fe dust and fume
XYLENE(PURE) 1330-20-7	STEL: 150 ppm TWA: 100 ppm	TWA: 100 ppm TWA: 435 mg/m³	
ETHYL ALCOHOL 64-17-5	STEL: 1000 ppm	TWA: 1000 ppm TWA: 1900 mg/m³	IDLH: 3300 ppm TWA: 1000 ppm TWA: 1900 mg/m³

NIOSH IDLH: Immediately Dangerous to Life or Health

Exposure controls

Engineering Measures

Showers
Eyewash stations
Ventilation systems.

Individual protection measures, such as personal protective equipment

Eye/Face Protection

Use personal protective equipment as required.

Skin and Body Protection

Chemical resistant apron.

Respiratory Protection

If exposure limits are exceeded or irritation is experienced, NIOSH/MSHA approved respiratory protection should be worn. Positive-pressure supplied air respirators may be required for high airborne contaminant concentrations. Respiratory protection must be provided in accordance with current local regulations.

Hygiene Measures Do not eat, drink or smoke when using this product. Regular cleaning of equipment, work area and clothing is recommended.

9. PHYSICAL AND CHEMICAL PROPERTIES

Physical state	Liquid	**Appearance**	Opaque
Odor	Solvent.	**Odor Threshold**	No data available
pH	No data available	**Flash Point**	-35 °F / -37 °C
Decomposition temperature	No data available	**Boiling Point**	34 °F / 1 °C
Melting Point / Melting Range	No data available	**Freezing Point**	No data available
Vapor Pressure @20°C (kPa)	No data available	**Partition coefficient:**	No data available
Vapor Density	No data available	**Density**	No data available
Bulk density	No data available	**Specific Gravity**	1.06
Evaporation Rate	No data available	**Water solubility**	No data available
Dynamic viscosity	No data available	**Weight per Gallon (lbs/gal):**	8.8
		Flammability Limits in Air	
		Upper	5.33 %
		Lower	1.22 %

10. STABILITY AND REACTIVITY

Reactivity
No data available

Chemical stability
Stable under recommended storage conditions.

Conditions to Avoid
Heat, flames and sparks.

Incompatible Materials
None known based on information supplied.

Hazardous Decomposition Products
Thermal decomposition can lead to release of irritating gases and vapors.

11. TOXICOLOGICAL INFORMATION

Information on likely routes of exposure

Product Information The product has not been tested

Inhalation There is no data for this product.

Eye Contact There is no data for this product.

Skin Contact There is no data for this product.

Ingestion There is no data for this product.

Chemical Name	Oral LD50	Dermal LD50	Inhalation LC50
ACETONE 67-64-1	N/A	N/A	50100 mg/m³ (Rat) 8 h
ETHYLENE GLYCOL BUTYL ETHER 111-76-2	470 mg/kg (Rat)	99 mg/kg (Rabbit)	450 ppm (Rat) 4 h
IRON OXIDE 1309-37-1	10000 mg/kg (Rat)	N/A	N/A

XYLENE(PURE) 1330-20-7	3500 mg/kg (Rat)	4350 mg/kg (Rabbit)	29.08 mg/L (Rat) 4 h
ETHYL ALCOHOL 64-17-5	N/A	N/A	124.7 mg/L (Rat) 4 h

Information on toxicological effects

Symptoms No information available.

Delayed and immediate effects as well as chronic effects from short and long-term exposure

Sensitization No information available.
MUTAGENIC EFFECTS No information available.
Carcinogenicity This product contains one or more substances which are classified by IARC as carcinogenic to humans (Group I), probably carcinogenic to humans (Group 2A) or possibly carcinogenic to humans (Group 2B).

Chemical Name	ACGIH	IARC	NTP	OSHA
ETHYLENE GLYCOL BUTYL ETHER 111-76-2	A3	Group 3	N/A	N/A
IRON OXIDE 1309-37-1	N/A	Group 3	N/A	N/A
XYLENE(PURE) 1330-20-7	N/A	Group 3	N/A	N/A
ETHYL ALCOHOL 64-17-5	A3	Group 1	Known	X

Legend:

ACGIH (American Conference of Governmental Industrial Hygienists)
A3 - Animal Carcinogen
IARC (International Agency for Research on Cancer)
Group 1 - Carcinogenic to Humans
Group 3 - Not Classifiable as to Carcinogenicity in Humans
NTP (National Toxicology Program)
Known - Known Carcinogen
OSHA (Occupational Safety and Health Administration of the US Department of Labor)
X - Present

Reproductive Toxicity No information available.
Specific target organ systemic toxicity (single exposure) No information available.
Specific target organ systemic toxicity (repeated exposure) No information available.
Chronic Toxicity Avoid repeated exposure. May cause adverse effects on the bone marrow and blood-forming system. May cause adverse liver effects.
Target Organ Effects Blood, Central nervous system (CNS), Eyes, Gastrointestinal tract (GI), Hematopoietic System, Kidney, Liver, Respiratory system, Skin.
Aspiration hazard No information available.

Numerical measures of toxicity - Product Information

The following values are calculated based on chapter 3.1 of the GHS document .

ATEmix (oral) 1254 mg/kg
ATEmix (dermal) 201 mg/kg
ATEmix (inhalation-dust/mist) 1316.5 mg/l
Oral LD50 9570 mg/kg (rat) Estimated
Dermal LD50 14358 mg/kg (rat) Estimated
Inhalation LC50 25874 mg/l (mist) (dust) mg/m³ Estimated
Inhalation LC50

12. ECOLOGICAL INFORMATION

Ecotoxicity

Chemical Name	Toxicity to Algae	Toxicity to Fish	Toxicity to daphnia and other aquatic invertebrates
ACETONE 67-64-1	N/A	4.74 - 6.33: 96 h Oncorhynchus mykiss mL/L LC50 6210 - 8120: 96 h Pimephales promelas mg/L LC50 static 8300: 96 h Lepomis macrochirus mg/L LC50	10294 - 17704: 48 h Daphnia magna mg/L EC50 Static 12600 - 12700: 48 h Daphnia magna mg/L EC50
ETHYLENE GLYCOL BUTYL ETHER 111-76-2	N/A	1490: 96 h Lepomis macrochirus mg/L LC50 static 2950: 96 h Lepomis macrochirus mg/L LC50	1000: 48 h Daphnia magna mg/L EC50
XYLENE(PURE) 1330-20-7	N/A	13.4: 96 h Pimephales promelas mg/L LC50 flow-through 2.661 - 4.093: 96 h Oncorhynchus mykiss mg/L LC50 static 13.5 - 17.3: 96 h Oncorhynchus mykiss mg/L LC50 13.1 - 16.5: 96 h Lepomis macrochirus mg/L LC50 flow-through 19: 96 h Lepomis macrochirus mg/L LC50 7.711 - 9.591: 96 h Lepomis macrochirus mg/L LC50 static 23.53 - 29.97: 96 h Pimephales promelas mg/L LC50 static 780: 96 h Cyprinus carpio mg/L LC50 semi-static 780: 96 h Cyprinus carpio mg/L LC50 30.26 - 40.75: 96 h Poecilia reticulata mg/L LC50 static	3.82: 48 h water flea mg/L EC50 0.6: 48 h Gammarus lacustris mg/L LC50
ETHYL ALCOHOL 64-17-5	N/A	12.0 - 16.0: 96 h Oncorhynchus mykiss mL/L LC50 static 100: 96 h Pimephales promelas mg/L LC50 static 13400 - 15100: 96 h Pimephales promelas mg/L LC50 flow-through	2: 48 h Daphnia magna mg/L EC50 Static 9268 - 14221: 48 h Daphnia magna mg/L LC50

Persistence and degradability
No information available.

Bioaccumulation
No information available.

Chemical Name	Partition coefficient
ACETONE 67-64-1	-0.24
ETHYLENE GLYCOL BUTYL ETHER 111-76-2	0.81
PROPYLENE CARBONATE 108-32-7	0.48
BUTYL ACETATE 123-86-4	1.81
XYLENE(PURE) 1330-20-7	3.15
DIACETONE ALCOHOL 123-42-2	1.03
ETHYL ALCOHOL 64-17-5	-0.32
PROPYLENE OXIDE 75-56-9	0.08
ETHYLBENZENE 100-41-4	3.118
PHENOL 108-95-2	1.47
METHANOL 67-56-1	-0.77
TOLUENE 108-88-3	2.65

FORMALDEHYDE 50-00-0	0.35
BENZENE 71-43-2	1.83

Other adverse effects No information available

13. DISPOSAL CONSIDERATIONS

Waste treatment methods

Waste treatment methods This material, as supplied, is a hazardous waste according to federal regulations (40 CFR 261).

US EPA Waste Number U002 U019 U031 U122 U154 U188 U220 U239 D001

Chemical Name	RCRA	RCRA - Basis for Listing	RCRA - D Series Wastes	RCRA - U Series Wastes
ACETONE 67-64-1	N/A	Included in waste stream: F039	N/A	U002
XYLENE(PURE) 1330-20-7	N/A	Included in waste stream: F039	N/A	U239

This product contains one or more substances that are listed with the State of California as a hazardous waste.

Chemical Name	California Hazardous Waste Status
ACETONE 67-64-1	Ignitable
XYLENE(PURE) 1330-20-7	Toxic Ignitable
ETHYL ALCOHOL 64-17-5	Toxic Ignitable

14. TRANSPORT INFORMATION

DOT

UN-No	UN1263
Proper shipping name	Paint
Hazard class	3
Packing Group	II
Special Provisions	149, B52, IB2, T4, TP1, TP8, TP28
Description	UN1263, Paint, 3, II, RQ
Emergency Response Guide Number	128

TDG

UN-No	UN1263
Proper shipping name	Paint
Hazard class	3
Packing Group	II
Description	UN1263, Paint, 3, II

MEX

UN-No	UN1263
Proper shipping name	Paint
Hazard class	3
Packing Group	II
Description	UN1263, Paint, 3, II

ICAO

UN-No	UN1263
Proper shipping name	Paint
Hazard class	3
Packing Group	II
Special Provisions	A3, A72
Description	UN1263, Paint, 3, II

ICAO

UN-No	UN1263
Proper shipping name	Paint
Hazard class	3
Packing Group	II
Special Provisions	A3, A72
Description	UN1263, Paint, 3, II

IMDG/IMO

UN-No	UN1263
Proper shipping name	Paint
Hazard class	3
Packing Group	II
EmS-No	F-E, S-E
Special Provisions	163
Description	UN1263, Paint, 3, II

RID

UN-No	UN1263
Proper shipping name	Paint
Hazard class	3
Packing Group	II
Classification Code	F1
Description	UN1263, Paint, 3, II

ADR/RID

UN-No	UN1263
Proper shipping name	Paint
Hazard class	3
Packing Group	II
Classification Code	F1
Tunnel restriction code	(D/E)
Special Provisions	163, 640C, 650
Description	UN1263, Paint, 3, II, (D/E)
ADR/RID-Labels	3

ADN

Proper shipping name	Paint
Hazard class	3
Packing Group	II
Classification Code	F1
Special Provisions	163, 640C, 650
Description	UN1263, Paint, 3, II
Limited Quantity (LQ)	5 L
Ventilation	VE01

15. REGULATORY INFORMATION

International Inventories

TSCA	Complies
DSL/NDSL	Complies
EINECS/ELINCS	Complies
ENCS	Complies
IECSC	Complies
KECL	Complies
PICCS	Complies
AICS	Complies

TSCA - United States Toxic Substances Control Act Section 8(b) Inventory
DSL/NDSL - Canadian Domestic Substances List/Non-Domestic Substances List
EINECS/ELINCS - European Inventory of Existing Chemical Substances/European List of Notified Chemical Substances
ENCS - Japan Existing and New Chemical Substances
IECSC - China Inventory of Existing Chemical Substances
KECL - Korean Existing and Evaluated Chemical Substances
PICCS - Philippines Inventory of Chemicals and Chemical Substances
AICS - Australian Inventory of Chemical Substances

US Federal Regulations

SARA 313

Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA). This product contains a chemical or chemicals which are subject to the reporting requirements of the Act and Title 40 of the Code of Federal Regulations, Part 372

Chemical Name	CAS No	SARA 313 - Threshold Values %
ETHYLENE GLYCOL BUTYL ETHER	111-76-2	1.0

SARA 311/312 Hazard Categories

Acute Health Hazard	Yes
Chronic Health Hazard	No
Fire Hazard	Yes
Sudden Release of Pressure Hazard	No
Reactive Hazard	No

CAA (Clean Air Act)

U.S. - CAA (Clean Air Act) - 1990 Hazardous Air Pollutants

Chemical Name	CAS No	Hazardous air pollutants (HAPs) content	VOC Chemicals	Class 1 Ozone Depletors	Class 2 Ozone Depletors
ACETONE	67-64-1	N/A	Group I	N/A	N/A
ETHYLENE GLYCOL BUTYL ETHER	111-76-2	N/A	Group I	N/A	N/A
XYLENE(PURE)	1330-20-7	Present	Group I	N/A	N/A

Clean Water Act

This product contains the following substances which are regulated pollutants pursuant to the Clean Water Act (40 CFR 122.21 and 40 CFR 122.42):

Chemical Name	CWA - Reportable Quantities	CWA - Toxic Pollutants	CWA - Priority Pollutants	CWA - Hazardous Substances
XYLENE(PURE)	100 lb	N/A	N/A	X

CERCLA

This material, as supplied, contains one or more substances regulated as a hazardous substance under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) (40 CFR 302)

Chemical Name	Hazardous Substances RQs	Extremely Hazardous Substances RQs	RQ (reportable quantity)
ACETONE	5000 lb	N/A	RQ 5000 lb final RQ RQ 2270 kg final RQ
XYLENE(PURE)	100 lb	N/A	RQ 100 lb final RQ RQ 45.4 kg final RQ

State Regulations

California Proposition 65

This product contains the following Proposition 65 chemicals

Chemical Name	CAS No	California Proposition 65
ETHYL ALCOHOL	64-17-5	Carcinogen Developmental

U.S. State Right-to-Know Regulations

Chemical Name	Massachusetts	New Jersey	Pennsylvania	Illinois	Rhode Island
ACETONE	X	X	X	N/A	X
ETHYLENE GLYCOL BUTYL ETHER	X	X	X	X	X
IRON OXIDE	X	X	X	N/A	X
PHOSPHORIC ACID	X	X	X	N/A	X
BUTYL ACETATE	X	X	X	N/A	X
XYLENE(PURE)	X	X	X	X	X
ETHYL ALCOHOL	X	X	X	X	X

International Regulations

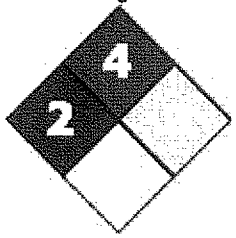
Mexico - Grade Severe risk, Grade 4

Chemical Name	Carcinogenic Status	Exposure Limits
ACETONE	N/A	Mexico: TWA 1000 ppm Mexico: TWA 2400 mg/m³ Mexico: STEL 1260 ppm Mexico: STEL 3000 mg/m³
ETHYLENE GLYCOL BUTYL ETHER	N/A	Mexico: TWA 26 ppm Mexico: TWA 120 mg/m³ Mexico: STEL 75 ppm Mexico: STEL 360 mg/m³
IRON OXIDE	N/A	Mexico: TWA 5 mg/m³ Mexico: STEL 10 mg/m³
XYLENE(PURE)	N/A	Mexico: TWA 100 ppm Mexico: TWA 435 mg/m³ Mexico: STEL 150 ppm Mexico: STEL 655 mg/m³
ETHYL ALCOHOL	N/A	Mexico: TWA 1000 ppm Mexico: TWA 1900 mg/m³

16. OTHER INFORMATION

NFPA **Health Hazard** 2 **Flammability** 4 **Instability** 0 **Physical and Chemical Hazards** -

NFPA Rating



HMIS Health Hazard 1 * Flammability 3 Physical Hazard 0 Personal protection X

Chronic Hazard Star Legend * *Chronic Health Hazard*

Issuing Date: 22-Dec-2011
Revision Date: 21-Nov-2014
Revision Note
No information available

Disclaimer
The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.

end

Material Safety Data Sheet

Issuing Date: 22-Dec-2011 **Revision Date:** 19-Sep-2013 **Version:** 2.3

1. PRODUCT AND COMPANY IDENTIFICATION

Product Code: 108T888
Hentzen Coatings, Inc.
1500 Lathem Street, Batavia, Illinois 60510-1499

Product Name: 3.50 VOC - BUFF STERILKOTE 46
Company Phone Number: 1-414-353-4200
Emergency Telephone: ChemTrec 1-800-424-9300

2. HAZARDS IDENTIFICATION

Emergency Overview

Harmful by inhalation
Irritating to eyes
May cause central nervous system depression
May be harmful if swallowed
May cause adverse kidney effects
EXTREMELY FLAMMABLE LIQUID AND VAPOR. VAPOR MAY CAUSE FLASH FIRE
Vapors may be irritating to eyes, nose, throat, and lungs

Potential Health Effects

Principle Routes of Exposure	Inhalation, Skin Contact, Eye Contact
Acute Toxicity	
Eyes	Prolonged contact may result in chemical burns or blindness. Moderately irritating to the eyes. May cause irritation.
Skin	May cause skin irritation and/or dermatitis. Repeated exposure may cause skin dryness or cracking. Prolonged skin contact may defat the skin and produce dermatitis. May cause irritation.
Inhalation	May be harmful if inhaled. May cause irritation of respiratory tract. Free formaldehdye will be liberated during the curing process that occurs in the oven. Proper exhaust ventilation of the ovens is necessary to control workplace exposures.
Ingestion	Harmful if swallowed. Ingestion may cause gastrointestinal irritation, nausea, vomiting and diarrhea. Ingestion may cause irritation to mucous membranes.
Chronic Toxicity	Avoid repeated exposure. May cause adverse liver effects.
Aggravated Medical Conditions	Central nervous system. Gastrointestinal tract. Preexisting eye disorders. Blood disorders. Kidney disorders. Liver disorders. Skin disorders. Respiratory disorders. Hematopoietic system. Lungs.
Interactions with Other Chemicals	Use of alcoholic beverages may enhance toxic effects.
Environmental hazard	See Section 12 for additional Ecological Information.

3. COMPOSITION/INFORMATION ON INGREDIENTS

Contains a known or suspected carcinogen

This product contains substances regulated as hazardous air pollutants (HAPS) under Section 112 of the Clean Air Act Amendments of 1990. See Section 15 for list of HAPS.

Hazardous Components

Chemical Name	CAS-No	Weight	ACGIH TLV	OSHA PEL
ACETONE	67-64-1	30% - 40%	STEL: 750 ppm TWA: 500 ppm	TWA: 1000 ppm TWA: 2400 mg/m³ (vacated) TWA: 750 ppm (vacated) TWA: 1800 mg/m³ (vacated) STEL: 2400 mg/m³ The acetone STEL does not apply to the cellulose acetate fiber industry. It is in effect for all other sectors (vacated) STEL: 1000 ppm
ETHYLENE GLYCOL BUTYL ETHER	111-76-2	10% - 20%	TWA: 20 ppm	TWA: 50 ppm TWA: 240 mg/m³ S*
TITANIUM DIOXIDE	13463-67-7	10% - 20%	TWA: 10 mg/m³	TWA: 15 mg/m³ total dust (vacated) TWA: 10 mg/m³ total dust
BARIUM SULFATE	7727-43-7	0% - 5%	TWA: 10 mg/m³	TWA: 15 mg/m³ total dust TWA: 5 mg/m³ respirable fraction
C.I. PIGMENT YELLOW 42	20344-49-4	0% - 5%	TWA: 1 mg/m³ Fe	(vacated) TWA: 1 mg/m³ Fe
BUTYL ALCOHOL	71-36-3	0% - 5%	TWA: 20 ppm	TWA: 100 ppm TWA: 300 mg/m³ (vacated) S* (vacated) Ceiling: 50 ppm (vacated) Ceiling: 150 mg/m³
ETHYL ALCOHOL	64-17-5	0% - 5%	STEL: 1000 ppm	TWA: 1000 ppm TWA: 1900 mg/m³ (vacated) TWA: 1000 ppm (vacated) TWA: 1900 mg/m³
IRON OXIDE	1309-37-1	0% - 5%	TWA: 5 mg/m³ respirable fraction TWA: 1 mg/m³ Fe	TWA: 10 mg/m³ fume (vacated) TWA: 10 mg/m³ fume (vacated) TWA: 1 mg/m³ Fe
XYLENE(PURE)	1330-20-7	0% - 5%	STEL: 150 ppm TWA: 100 ppm	TWA: 100 ppm TWA: 435 mg/m³ (vacated) TWA: 100 ppm (vacated) TWA: 435 mg/m³ (vacated) STEL: 150 ppm (vacated) STEL: 655 mg/m³

4. FIRST AID MEASURES

General advice Show this material safety data sheet to the doctor in attendance. If symptoms persist, call a physician.

Eye Contact Immediately flush with plenty of water. After initial flushing, remove any contact lenses and continue flushing for at least 15 minutes. Keep eye wide open while rinsing. If symptoms persist, call a physician.

Skin Contact Immediate medical attention is not required. Wash off immediately with soap and plenty of water while removing all contaminated clothes and shoes. If skin irritation persists, call a physician.

Inhalation

Consult a physician. If breathing is irregular or stopped, administer artificial respiration. Avoid direct contact with skin. Use barrier to give mouth-to-mouth resuscitation. Move to fresh air. Immediate medical attention is not required. Move to fresh air in case of accidental inhalation of vapors. If symptoms persist, call a physician.

Ingestion

Do NOT induce vomiting. Rinse mouth. Drink plenty of water. If symptoms persist, call a physician. Clean mouth with water and afterwards drink plenty of water. Never give anything by mouth to an unconscious person. Consult a physician.

5. FIRE-FIGHTING MEASURES

Flammable Properties Extremely flammable liquid and vapor

Flash Point -35 °F / -37 °C

Flammability Limits in Air
Upper 5.95 %
Lower 1.19 %

Suitable Extinguishing Media Dry Chemical.

Explosion Data
Sensitivity to Mechanical Impact None.
Sensitivity to Static Discharge Yes.

Specific hazards arising from the chemical Extremely flammable. Flash back possible over considerable distance.

Protective Equipment and Precautions for Firefighters As in any fire, wear self-contained breathing apparatus pressure-demand, MSHA/NIOSH (approved or equivalent) and full protective gear

HMIS **Health Hazard** 1 * **Flammability** 3 **Physical Hazard** 1 **Personal protection** X
* *Chronic Health Hazard*

6. ACCIDENTAL RELEASE MEASURES

Personal Precautions Evacuate personnel to safe areas. Remove all sources of ignition. Ensure adequate ventilation. Take precautionary measures against static discharges. Use personal protective equipment. Keep people away from and upwind of spill/leak. Avoid breathing vapors or mists. Ventilate the area.

Environmental Precautions Prevent further leakage or spillage if safe to do so. Prevent product from entering drains. Do not flush into surface water or sanitary sewer system.

Methods for Containment Prevent further leakage or spillage if safe to do so.

Methods for Cleaning Up Pick up and transfer to properly labeled containers. Dam up. Soak up with inert absorbent material (e.g. sand, silica gel, acid binder, universal binder, sawdust). Soak up with inert absorbent material.

7. HANDLING AND STORAGE

Advice on Safe Handling

Ensure adequate ventilation. Take necessary action to avoid static electricity discharge (which might cause ignition of organic vapors). Keep away from open flames, hot surfaces and sources of ignition. Take precautionary measures against static discharges. Use only in an area containing flame proof equipment. To avoid ignition of vapors by static electricity discharge, all metal parts of the equipment must be grounded. Use only in area provided with appropriate exhaust ventilation. Wear personal protective equipment. Do not breathe vapors or spray mist. Avoid contact with eyes. Use bonding and grounding when transferring materials. Use non-sparking tools and equipment.

Technical Measures/Storage Conditions

Keep tightly closed in a dry and cool place. Keep in properly labeled containers. Keep in an area equipped with sprinklers. Keep containers tightly closed in a cool, well-ventilated place. Keep away from heat and sources of ignition.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Exposure Guidelines

Chemical Name	ACGIH TLV	OSHA PEL
ACETONE	STEL: 750 ppm TWA: 500 ppm	TWA: 1000 ppm TWA: 2400 mg/m³ (vacated) TWA: 750 ppm (vacated) TWA: 1800 mg/m³ (vacated) STEL: 2400 mg/m³ The acetone STEL does not apply to the cellulose acetate fiber industry. It is in effect for all other sectors (vacated) STEL: 1000 ppm
ETHYLENE GLYCOL BUTYL ETHER	TWA: 20 ppm	TWA: 50 ppm TWA: 240 mg/m³ S*
TITANIUM DIOXIDE	TWA: 10 mg/m³	TWA: 15 mg/m³ total dust (vacated) TWA: 10 mg/m³ total dust
BARIUM SULFATE	TWA: 10 mg/m³	TWA: 15 mg/m³ total dust TWA: 5 mg/m³ respirable fraction
C.I. PIGMENT YELLOW 42	TWA: 1 mg/m³ Fe	(vacated) TWA: 1 mg/m³ Fe
BUTYL ALCOHOL	TWA: 20 ppm	TWA: 100 ppm TWA: 300 mg/m³ (vacated) S* (vacated) Ceiling: 50 ppm (vacated) Ceiling: 150 mg/m³
ETHYL ALCOHOL	STEL: 1000 ppm	TWA: 1000 ppm TWA: 1900 mg/m³ (vacated) TWA: 1000 ppm (vacated) TWA: 1900 mg/m³
IRON OXIDE	TWA: 5 mg/m³ respirable fraction TWA: 1 mg/m³ Fe	TWA: 10 mg/m³ fume (vacated) TWA: 10 mg/m³ fume (vacated) TWA: 1 mg/m³ Fe
XYLENE(PURE)	STEL: 150 ppm TWA: 100 ppm	TWA: 100 ppm TWA: 435 mg/m³ (vacated) TWA: 100 ppm (vacated) TWA: 435 mg/m³ (vacated) STEL: 150 ppm (vacated) STEL: 655 mg/m³

NIOSH IDLH: Immediately Dangerous to Life or Health

Engineering Measures

Handle only in a place equipped with local exhaust (or other appropriate exhaust). However it is the duty of the user to verify this and follow given exposure limits at the workplace. Keep away from fire, sparks and heated surfaces.

Personal Protective Equipment

Eye/Face Protection

Safety glasses with side-shields. Tightly fitting safety goggles. Face-shield.

Skin and Body Protection

Solvent-resistant gloves. Handle in accordance with good industrial hygiene and safety practice. Remove contaminated clothing and shoes. Wash contaminated clothing before reuse.

Respiratory Protection Maintain adequate ventilation. If exposure limits are exceeded or irritation is experienced, NIOSH/MSHA approved respiratory protection should be worn. Respiratory protection must be provided in accordance with current local regulations.

Hygiene Measures When using, do not eat, drink or smoke. Provide regular cleaning of equipment, work area and clothing.

9. PHYSICAL AND CHEMICAL PROPERTIES

Physical State @20°C	Liquid	**Appearance**	Opaque
Odor	Solvent.	**Flash Point**	-35 °F / -37 °C
Boiling Point	34 °F / 1 °C	**Specific Gravity**	1.1
Weight per Gallon (lbs/gal):	9.2		
Flammability Limits in Air			
Upper	5.95 %		
Lower	1.19 %		

10. STABILITY AND REACTIVITY

Stability Stable under recommended storage conditions.

Incompatible Products Strong oxidizing agents.

Conditions to Avoid Heat, flames and sparks.

Hazardous Decomposition Products Carbon monoxide (CO), carbon dioxide (CO_2). Thermal decomposition can lead to release of irritating gases and vapors. Free formaldehyde.

Hazardous Polymerization Hazardous polymerization does not occur.

11. TOXICOLOGICAL INFORMATION

Acute Toxicity

Product Information n-butyl alcohol has been shown to affect the auditory nerve and possibly a loss of hearing. Long-term repeated exposure to Xylene may result in hearing loss.

Component Information

Chemical Name	LD50 Oral	LD50 Dermal	LC50 Inhalation
ACETONE	5800 mg/kg (Rat)	-	-
ETHYLENE GLYCOL BUTYL ETHER	470 mg/kg (Rat)	2270 mg/kg (Rat) 220 mg/kg (Rabbit)	2.21 mg/L (Rat) 4 h 450 ppm (Rat) 4 h
TITANIUM DIOXIDE	10000 mg/kg (Rat)	-	-
C.I. PIGMENT YELLOW 42	10000 mg/kg (Rat)	-	-
BUTYL ALCOHOL	790 mg/kg (Rat)	3400 mg/kg (Rabbit)	8000 ppm (Rat) 4 h 17.7 mg/L (Rat) 4 h
ETHYL ALCOHOL	7060 mg/kg (Rat)	-	-
IRON OXIDE	10000 mg/kg (Rat)	-	-
XYLENE(PURE)	4300 mg/kg (Rat)	1700 mg/kg (Rabbit)	47635 mg/L (Rat) 4 h 5000 ppm (Rat) 4 h

Chronic Toxicity

Product Information n-butyl alcohol has been shown to affect the auditory nerve and possibly a loss of hearing. Long-term repeated exposure to Xylene may result in hearing loss. Avoid repeated exposure. May cause adverse liver effects.

Carcinogenicity

This product contains one or more substances which are classified by IARC as carcinogenic to humans (Group I), probably carcinogenic to humans (Group 2A) or possibly carcinogenic to humans (Group 2B).

Chemical Name	IARC	ACGIH	NTP	OSHA
ETHYLENE GLYCOL BUTYL ETHER	Group 3	A3	-	-
TITANIUM DIOXIDE	Group 2B	-	-	X
ETHYL ALCOHOL	Group 1	A3	Known	X
IRON OXIDE	Group 3	-	-	-
XYLENE(PURE)	Group 3	-	-	-

Legend:

ACGIH: (American Conference of Governmental Industrial Hygienists)
A3 - Animal Carcinogen
IARC: (International Agency for Research on Cancer)
Group 1 - Carcinogenic to Humans
Group 2B - Possibly Carcinogenic to Humans
Group 3 - Not Classifiable as to Carcinogenicity in Humans
NTP: (National Toxicity Program)
Known - Known Carcinogen
OSHA: (Occupational Safety & Health Administration)
X - Present

Target Organ Effects

Blood, Central nervous system (CNS), Eyes, Gastrointestinal tract (GI), Hematopoietic System, Kidney, Liver, Lungs, Respiratory system, Skin.

12. ECOLOGICAL INFORMATION

Toxicity

Ecotoxicity effects

Contains no substances known to be hazardous to the environment or that are not degradable in waste water treatment plants

Chemical Name	Toxicity to algae	Toxicity to fish	Toxicity to microorganisms	Toxicity to daphnia and other aquatic invertebrates
ACETONE		4.74-6.33: 96 h Oncorhynchus mykiss ml/L LC50 6210-8120: 96 h Pimephales promelas mg/L LC50 static 8300: 96 h Lepomis macrochirus mg/L LC50		10294 - 17704: 48 h Daphnia magna mg/L EC50 Static 12600 - 12700: 48 h Daphnia magna mg/L EC50
ETHYLENE GLYCOL BUTYL ETHER		1490: 96 h Lepomis macrochirus mg/L LC50 static 2950: 96 h Lepomis macrochirus mg/L LC50		1698 - 1940: 24 h Daphnia magna mg/L EC50 1000: 48 h Daphnia magna mg/L EC50
BUTYL ALCOHOL	500: 96 h Desmodesmus subspicatus mg/L EC50 500: 72 h Desmodesmus subspicatus mg/L EC50	1730-1910: 96 h Pimephales promelas mg/L LC50 static 1740: 96 h Pimephales promelas mg/L LC50 flow-through 100000-500000: 96 h Lepomis macrochirus µg/L LC50 static 1910000: 96 h Pimephales promelas µg/L LC50 static		1983: 48 h Daphnia magna mg/L EC50 1897 - 2072: 48 h Daphnia magna mg/L EC50 Static

ETHYL ALCOHOL		12.0-16.0: 96 h Oncorhynchus mykiss ml/L LC50 static 100: 96 h Pimephales promelas mg/L LC50 static 13400-15100: 96 h Pimephales promelas mg/L LC50 flow-through		9268 - 14221: 48 h Daphnia magna mg/L LC50 10800: 24 h Daphnia magna mg/L EC50 2: 48 h Daphnia magna mg/L EC50 Static
XYLENE(PURE)		13.4: 96 h Pimephales promelas mg/L LC50 flow-through 2.661-4.093: 96 h Oncorhynchus mykiss mg/L LC50 static 13.5-17.3: 96 h Oncorhynchus mykiss mg/L LC50 13.1-16.5: 96 h Lepomis macrochirus mg/L LC50 flow-through 19: 96 h Lepomis macrochirus mg/L LC50 7.711-9.591: 96 h Lepomis macrochirus mg/L LC50 static 23.53-29.97: 96 h Pimephales promelas mg/L LC50 static 780: 96 h Cyprinus carpio mg/L LC50 semi-static 780: 96 h Cyprinus carpio mg/L LC50 30.26-40.75: 96 h Poecilia reticulata mg/L LC50 static		3.82: 48 h water flea mg/L EC50 0.6: 48 h Gammarus lacustris mg/L LC50

Persistence and degradability

No information available

Bioaccumulative potential

No information available

Chemical Name	log Pow
ACETONE	-0.24
ETHYLENE GLYCOL BUTYL ETHER	0.81
BUTYL ALCOHOL	0.785
ETHYL ALCOHOL	-0.32
XYLENE(PURE)	3.15

Mobility in soil

No information available

Results of PBT and vPvB assessment

Other adverse effects

13. DISPOSAL CONSIDERATIONS

Waste Disposal Methods This material, as supplied, is a hazardous waste according to federal regulations (40 CFR 261).

US EPA Waste Number U002 U019 U031 U122 U154 U161 U220 U239 D001

This product contains one or more substances that are listed with the State of California as a hazardous waste.

Chemical Name	California Hazardous Waste Status
ACETONE	Ignitable

BARIUM SULFATE	Toxic soluble
BUTYL ALCOHOL	Toxic
ETHYL ALCOHOL	Toxic Ignitable
XYLENE(PURE)	Toxic Ignitable

14. TRANSPORT INFORMATION

DOT

Proper shipping name	Paint
Hazard class	3
UN/ID No	UN1263
Packing Group	II
Reportable Quantity (RQ)	Acetone: RQ kg= 7399.53
Description	UN1263, Paint, 3, II, RQ
Emergency Response Guide Number	128

TDG

Proper shipping name	Paint
Hazard class	3
UN/ID No	UN1263
Packing Group	II
Description	UN1263, Paint, 3, II

MEX

Proper shipping name	Paint
Hazard class	3
UN/ID No	UN1263
Packing Group	II
Description	UN1263, Paint, 3, II

ICAO

UN/ID No	UN1263
Proper shipping name	Paint
Hazard class	3
Packing Group	II
Description	UN1263, Paint, 3, II

ICAO/IATA

UN/ID No	UN1263
Proper shipping name	Paint
Hazard class	3
Packing Group	II
ERG Code	3L
Description	UN1263, Paint, 3, II

IMDG/IMO

Proper shipping name	Paint
Hazard class	3
UN/ID No	UN1263
Packing Group	II
EmS No.	F-E, S-E
Description	UN1263, Paint, 3, II

RID

Proper shipping name	Paint
Hazard class	3
UN/ID No	UN1263
Packing Group	II
Classification Code	F1
Description	UN1263, Paint, 3, II

ADR/RID

Proper shipping name	Paint
Hazard class	3
UN/ID No	UN1263
Packing Group	II
Classification Code	F1
Description	UN1263, Paint, 3, II, (D/E)
ADR/RID-Labels	3

ADN

Proper shipping name	Paint
Hazard class	3
UN/ID No	UN1263
Packing Group	II
Classification Code	F1
Special Provisions	163, 640C, 650
Description	UN1263, Paint, 3, II
Limited quantity	5 L
Ventilation	VE01

15. REGULATORY INFORMATION

International Inventories

TSCA	Complies
DSL/NDSL	Complies

Legend

TSCA - United States Toxic Substances Control Act Section 8(b) Inventory
DSL/NDSL - Canadian Domestic Substances List/Non-Domestic Substances List

U.S. Federal Regulations

SARA 313

Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA). This product contains a chemical or chemicals which are subject to the reporting requirements of the Act and Title 40 of the Code of Federal Regulations, Part 372:

Chemical Name	CAS-No	Weight	SARA 313 - Threshold Values %
ETHYLENE GLYCOL BUTYL ETHER	111-76-2	10% - 20%	1.0
BUTYL ALCOHOL	71-36-3	0% - 5%	1.0

SARA 311/312 Hazard Categories

Acute Health Hazard	Yes
Chronic Health Hazard	No
Fire Hazard	Yes
Sudden Release of Pressure Hazard	No
Reactive Hazard	No

Clean Air Act, Section 112 Hazardous Air Pollutants (HAPs) (see 40 CFR 61)

This product contains the following substances which are listed hazardous air pollutants (HAPS) under Section 112 of the Clean Air Act:

Chemical Name	CAS-No	Weight	HAPS data	VOC Chemicals	Class 1 Ozone Depletors	Class 2 Ozone Depletors
ACETONE	67-64-1	30.6776	-	Group I	-	-
ETHYLENE GLYCOL BUTYL ETHER	111-76-2	15.6937	-	Group I	-	-
XYLENE(PURE)	1330-20-7	0.162291	Present	Group I	-	-

Clean Water Act

This product contains the following substances which are regulated pollutants pursuant to the Clean Water Act (40 CFR 122.21 and 40 CFR 122.42):

Chemical Name	CWA - Reportable Quantities	CWA - Toxic Pollutants	CWA - Priority Pollutants	CWA - Hazardous Substances
XYLENE(PURE)	100 lb	-	-	X

CERCLA

This material, as supplied, contains one or more substances regulated as a hazardous substance under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) (40 CFR 302):

Chemical Name	Hazardous Substances RQs	Extremely Hazardous Substances RQs	RQ
ACETONE	5000 lb	-	RQ 5000 lb final RQ RQ 2270 kg final RQ
BUTYL ALCOHOL	5000 lb	-	RQ 5000 lb final RQ RQ 2270 kg final RQ
XYLENE(PURE)	100 lb	-	RQ 100 lb final RQ RQ 45.4 kg final RQ

U.S. State Regulations

California Proposition 65

This product contains the following Proposition 65 chemicals:

Chemical Name	CAS-No	California Prop. 65
ETHYL ALCOHOL	64-17-5	Carcinogen Developmental

U.S. State Right-to-Know Regulations

Chemical Name	Massachusetts	New Jersey	Pennsylvania	Illinois	Rhode Island
ACETONE	X	X	X	-	X
ETHYLENE GLYCOL BUTYL ETHER	X	X	X	X	X
TITANIUM DIOXIDE	X	X	X	-	X
BARIUM SULFATE	X	X	X	-	X
BUTYL ALCOHOL	X	X	X	-	X
BUTYL ACETATE	X	X	X	-	X
PHOSPHORIC ACID	X	X	X	-	X
ETHYL ALCOHOL	X	X	X	-	X
XYLENE(PURE)	X	X	X	X	X

International Regulations

Mexico - Grade Severe risk, Grade 4

Chemical Name	Carcinogen Status	Exposure Limits

ACETONE	-	Mexico: TWA 1000 ppm Mexico: TWA 2400 mg/m³ Mexico: STEL 1260 ppm Mexico: STEL 3000 mg/m³
ETHYLENE GLYCOL BUTYL ETHER	-	Mexico: TWA 26 ppm Mexico: TWA 120 mg/m³ Mexico: STEL 75 ppm Mexico: STEL 360 mg/m³
TITANIUM DIOXIDE	-	Mexico: TWA 10 mg/m³ Mexico: STEL 20 mg/m³
BARIUM SULFATE	-	Mexico: TWA 0.5 mg/m³
C.I. PIGMENT YELLOW 42	-	Mexico: TWA 1 mg/m³ Mexico: STEL 2 mg/m³
BUTYL ALCOHOL	-	Mexico: Ceiling 50 ppm Mexico: Ceiling 150 mg/m³
ETHYL ALCOHOL	-	Mexico: TWA 1000 ppm Mexico: TWA 1900 mg/m³
IRON OXIDE	-	Mexico: TWA 5 mg/m³ Mexico: TWA 1 mg/m³ Mexico: STEL 10 mg/m³ Mexico: STEL 2 mg/m³
XYLENE(PURE)	-	Mexico: TWA 100 ppm Mexico: TWA 435 mg/m³ Mexico: STEL 150 ppm Mexico: STEL 655 mg/m³

16. OTHER INFORMATION

DISCLAIMER

The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.

end

SHEBOYGAN PAINT COMPANY
1439 North 25th Street / P.O. Box 417
Sheboygan, WI 53082-0417
Phone: (920)458-2157
Customer Service: custserv@shebpaint.com

EMERGENCY CONTACT ONLY:
Transportation Spill Emergency (24 hour)
1-800-924-6804 Reference CIN 1154

73-6381 **SAFETY DATA SHEET** PAGE: 1

1.0 PRODUCT AND SUPPLIER IDENTIFICATION

PRODUCT CLASS	TRADE NAME	MFG PRODUCT NO.
INDUSTRIAL COATING PRODUCT	YELLOW AQUA ENAMEL	73-6381

Identified Uses: INDUSTRIAL COATINGS, RESINS AND PAINT RELATED MATERIALS

Supplier: SHEBOYGAN PAINT COMPANY
1439 NORTH 25th STREET / P.O. BOX 417
SHEBOYGAN, WI 53082-0417

Emergency Contact: Transportation Emergency (24 hour) 1-800-924-6804

Other Contacts: Customer Service (920) 458-2157
custserv@shebpaint.com
sds@shebpaint.com
www.shebpaint.com

2.0 HAZARDS IDENTIFICATION

Classification	Cat	HCODE	Description
Skin irritation	2	H315	Causes skin irritation
Eye irritant 2A	2	H319	Causes serious eye irritation
Acute toxicity oral	4	H302	Harmful if swallowed
Acute toxicity dermal	4	H312	Harmful in contact with skin
Flammable liquid	4	H227	Combustible liquid
Acute toxicity inhaled gases/vapors/dust/mist	4	H332	Harmful if inhaled
Specific target organ acute irritation-respiratory	3	H335	May cause respiratory irritation
Specific target organ acute narcotic effects (CNS)	3	H336	May cause drowsiness or dizziness
Skin sensitizer 1B	1	H317	May cause an allergic skin reaction

Precautionary Statements:

Wash face, hands, and any exposed skin thoroughly after handling.
Wear protective gloves/protective clothing/eye protection/ face protection.
IF ON SKIN: Wash with soap and water.
See specific treatment for first aid in SDS section 4.
If skin irritation occurs: Get medical advice/attention.
IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses if present and easy to do, continue rinsing eyes.
If eye irritation persists: Get medical advice/attention.
Do not eat, drink or smoke when using this product.
IF SWALLOWED: Call a POISON CENTER or doctor/physician if you feel unwell.
Rinse mouth.
Dispose of contents/container to licensed waste facility in accordance with local and national regulations, see SDS section 13 for additional information.
Call a POISON CENTER or doctor/physician if you feel unwell.
See specific measures for safe handling in SDS sections 7 and 13.
Wash contaminated clothing before reuse.
Keep away from heat/sparks/open flames/hot surfaces. NO SMOKING.
In case of fire: See SDS section 5 for specific fire extinguishing agents.
Store in a well ventilated place. Keep cool.

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Transportation Spill Emergency (24 hour)
1-800-924-6804 Reference CIN 1154

Avoid breathing dust/fume/gas/mist/vapors/spray.
Use only outdoors or in a well-ventilated area.
IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing
Store in a well ventilated place. Keep container tightly closed.
Contaminated work clothing should not be allowed out of the workplace.
If skin irritation or a rash occurs: Get medical advice/attention.

Signal Word: WARNING

Other Hazards Which Do Not Result In Classification:

Use in a well ventilated area.
Do not take internally. Do not get in eyes or on skin.
Keep containers tightly closed.
Do not eat, drink or smoke when using this product. Wash face, hands and any exposed skin thoroughly after handling.
May cause allergic reaction in special sensitive persons.

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3.0 COMPOSITION AND INFORMATION ON INGREDIENTS

NT	INGREDIENT	CAS#	ACGIH TLV PPM	ACGIH TLV mg/m3	ACGIH STEL PPM	ACGIH STEL mg/m3	OSHA PEL PPM	OSHA PEL mg/m3	OSHA CEILING PPM	OSHA CEILING mg/m3	LEL % VOLUM	VAPOR PRESS mm/Hg DEG F	% BY Wght
C	Glycol Ether Compd.(skin)	111-76-2	20.00	97.00	------	------	50.00	240.0	------	------	1.100	0.600 @ 68.	5.60
A	Secondary Butyl Alcohol	78-92-2	100.0	300.0	------	------	150.0	450.0	------	------	1.700	12.50 @ 68.	3.99
	NON-HAZARDOUS COMPONENT: Water	7732-18-5	------	------	------	------	------	------	------	------	------	17.50 @ 68.	50.3
	C.I. Pigment Yellow #74	6358-31-2	------	------	------	------	------	------	------	------	------	------ @ ---	
	Iron (III) Oxide (dust)	51274-00-1	------	5.000	------	------	------	10.00	------	------	------	------ @ ---	
	Titanium Dioxide	13463-67-7	------	10.00	------	------	------	15.00	------	------	------	------ @ ---	

C -This toxic chemical is subject to the reporting requirements of both Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986 (40CFR372) and the Wisconsin Dept. of Natural Resources Administrative Code Chapter NR445.
VHAP = VOLATILE HAZARDOUS AIR POLLUTANT (VAPOR)
HAP = HAZARDOUS AIR POLLUTANT (SOLID)
(skin) = OSHA Skin Absorption Hazard
VOC content determined by EPA method 24.

A -This toxic chemical is subject to the reporting requirements of Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986 (40CFR372).
VHAP = VOLATILE HAZARDOUS AIR POLLUTANT (VAPOR)
HAP = HAZARDOUS AIR POLLUTANT (SOLID)
VOC content determined by EPA method 24.

	BY WEIGHT	BY VOLUME
PERCENT SOLIDS :	38.85	27.62
PERCENT WATER :	50.33	57.82
PERCENT NON-EXEMPT SOLVENT :	10.82	14.56
PERCENT EXEMPT SOLVENT :		

VOC (WITH WATER AND EXEMPT SOLV): 1.04 LBS/GAL 124.63 GMS/LITER
VOC (LESS WATER AND EXEMPT SOLV): 2.45 LBS/GAL 293.61 GMS/LITER

PERCENT HAPS BY WEIGHT :
VOC LBS PER GALLON SOLIDS : 3.77
VOC KILOGRMS PER KILOGRMS SOLIDS: .28
VOC HAPS LBS PER GALLON SOLIDS :
VOC HAPS LBS PER LBS SOLIDS :

4.0 FIRST AID MEASURES

GENERAL ADVICE: If you feel unwell seek advice immediately. Physicians: treat exposures symptomatically & supportively.
FIRST AID FOR EYE CONTACT: Flush the eyes and eyelids with plenty of water for at least 15 minutes. Hold eyelids apart to ensure flushing of the entire area. Remove contact lenses if present and easy to do. Get medical attention.
FIRST AID FOR SKIN CONTACT: Remove contaminated clothing and contaminated shoes. Wash all affected areas with soap and water. Consult medical attention if you feel unwell.
FIRST AID FOR INHALATION OF VAPORS: Move exposed individual to fresh air. For any difficulty in breathing, give oxygen and get immediate emergency medical assist. Monitor for respiratory distress. Be prepared to give rescue breathing. If unconscious, place in recovery position with airway open. Loosen tight clothing.
FIRST AID FOR INGESTION: DO NOT INDUCE VOMITING. Give 1-2 glasses of water to conscious person. Get prompt medical assistance or treatment. Keep head low in case of vomiting. Keep head lower than the knees to prevent fluids from entering lungs. Never give fluids to an unconscious person.
IF A LARGE QUANTITY IS INGESTED, CALL A POISON CENTER OR CONTACT A LOCAL EMERGENCY MEDICAL SERVICE AT ONCE.

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MEDICAL CONDITIONS PRONE TO AGGRAVATION BY EXPOSURE: None known, no specific information available.

5.0 FIRE FIGHTING MEASURES

EXTINGUISHING MEDIA: Water based product. This product does not sustain combustion. If water has boiled off this product may exhibit properties of NFPA class II, IIIA or IIIB liquids. Class B fire extinguishers may be used.
UNUSUAL FIRE & EXPLOSION HAZARDS: Water based product. Sealed containers may explode if exposed to extreme heat. Frozen containers may expand and leak contents when thawed. Water soluble liquids are non-accumulators of static charge. Static protection precautions such as container bonding or grounding would not be necessary. Flash point listed as N/A or not applicable due to the presence of water.
SPECIAL FIRE FIGHTING PROCEDURES: Water may be used to cool closed containers to prevent pressure buildup. Use water spray to cool fire exposed containers if they cannot be safely moved. Keep people away from firefighting operations involving chemicals. Firefighters wear a self-contained positive pressure breathing apparatus in addition to full protective gear.
CONDITIONS TO AVOID: Dust particles from this product may pose a flammable or explosion hazard. Do not drag, puncture or drop container (prevent sparks). Avoid dust accumulation. Containers should be grounded. Keep away from high heat, flames, sparks or static discharge.
This product contains an organic pigment which when exposed to extremely high temperatures for extended periods of time may burn and smolder emitting noxious fumes that may include nitrogen, carbon and/or sulfur and other toxic compounds.
DANGER! Combustible dust residue may form from this product. Finely divided and suspended particulates in air may form explosive mixtures. If dust clouds are formed, there is a chance of explosion hazard. Minimize airborne dust. Prevent accumulation of dust. Eliminate all fire/ignition sources including static discharge. Always bond/ground containers. Establish good housekeeping practices.

6.0 ACCIDENTAL RELEASE MEASURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Provide adequate ventilation to spill area. Dike spill area and collect with inert absorbent, sand, earth. Avoid contact and vapors, see approved PPE devices listed in Section 8. Follow all local, state and federal spill reporting rules. Only properly trained personnel should clean spill hazards. Personnel without proper PPE should leave the spill area. Obtain professional emergency/clean up services as needed.
ENVIRONMENTAL CONCERNS: Follow all local, state, provincial and/or federal spill notification procedures. Do not flush into sewers, drains or waterways.
WASTE DISPOSAL CONSIDERATIONS: Waste must be disposed in accordance with local, state, provincial and/or federal regulations. Empty containers must be handled with care as they retain product residue. Before disposing containers, remove as much residue as possible. Do not reuse containers until they are properly recycled. Check Section 13 for waste disposal options. Follow all label and SDS warnings.

7.0 HANDLING AND STORAGE

ADVICE ON SAFE HANDLING: Wash hands thoroughly after handling. Wear proper PPE, eye protection, gloves and respirator. Maintain good housekeeping. Eye wash stations should be available in the workplace. Avoid puncturing the container, do not drag or drop. Spray operations must protect the worker from both vapors & spray/mist overspray. Keep from Freezing.
CONDITIONS FOR SAFE STORAGE: Follow safe warehousing procedures. Avoid puncturing the container. Keep containers away from excessive heat. KEEP FROM FREEZING!

8.0 EXPOSURE CONTROL / PERSONAL PROTECTION

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SELECTING PROTECTIVE EQUIPMENT AND CLOTHING: When choosing personal protective equipment and clothing, consider each worker's environment, ventilation, temperature, all chemical exposures and any other adverse physical conditions. The level of protection needed for eye/skin, respiratory and other protection should be part of an ongoing job safety analysis conducted by the end user and supervisor. Safety Data Sheet Sections 2,3,8 and 11 should be consulted.
EXPOSURE CONTROLS: Provide sufficient mechanical or natural ventilation or exhaust to maintain exposures below limit guidelines or below levels that cause known, suspect or apparent side effects or the formation of dust or vapors. Allow easy access to emergency shower/eye wash facilities. Wash any contaminated clothing before reuse.
SKIN PROTECTION: Chemical resistant gloves are recommended. Use neoprene, Viton or butyl rubber. Cover exposed skin with chemical resistant long sleeve clothing. The use of barrier creams should be minimized. Chemical resistant boots or footwear should be used. Chemical apron or suit should be worn.
EYE PROTECTION: Eye protection should be worn in any type of industrial operation. The use of safety glasses with side shields (or goggles) and a face shield is recommended to prevent against liquid splash. Contact lenses should not be worn.
VENTILATION: Provide sufficient ventilation to keep dust/ airborne particulates and organic vapor concentrations below OSHA personal exposure limits (PEL) of the chemicals listed in Section 3. Remove smoke or fumes formed by welding, flame cutting or grinding surfaces coated with this material. Provide proper respiratory protection if ventilation or exhaust is inadequate. Use explosion-proof ventilation equipment.
RESPIRATORY PROTECTION: In outdoor or open areas with good ventilation additional precautions should not be needed. If exposure limits are exceeded or if irritation is experienced, use a NIOSH approved respirator. Use a SCBA for confined spaces or poor ventilation. Follow the OSHA prescribed respiratory protection program guidelines for the chemicals found in Section 3. Consult your safety supplier for the correct respirator system specifications.
OTHER PROTECTIVE EQUIPMENT: The use of chemical resistant protective suit is suggested. Avoid any skin contact with vapors, mists, or spray. Prevent contact of materials with clothing if possible. Remove and wash contaminated clothing before re-use. Use an industrial type professional cleaning service, do not wash at home. Do not wear contaminated clothing or shoes away from the workplace. Leather products contaminated with this product should be discarded.
Exposure Limits For Inert and Nuisance Dust Particulates Not Otherwise Classified: OSHA (PEL): TWA =15 mg/m3 (total dust) 5 mg/m3 (respirable fraction). ACGIH(TLV): TWA = 10 mg/m3 (total dust).
Exposure Limits For iron oxide (fume): (CAS# 1309-37-1) OSHA (PEL): TWA =10 mg/m3 (as total particulates) ACGIH(TLV): TWA = 5 mg/m3.
Exposure Limits for titanium dioxide(dust): OSHA (PEL): TWA =15 mg/m3 (total dust) 5mg/m3 (respirable) ACGIH(TLV): TWA =10 mg/m3 (total dust).

9.0 PHYSICAL AND CHEMICAL PROPERTIES

APPEARANCE	YELLOW/ORANGE LIQUID
ODOR	Chemical
ODOR THRESHOLD (ppm)	.12
pH	8.5-9
FREEZING POINT	32 Degrees Fahrenheit, 0 Degrees Celsius
BOILING RANGE	208-650 F
FLASH POINT	N/A
EVAPORATION RATE	SLOWER THAN WATER
LEL% BY VOLUME	See Section 3
VAPOR PRESSURE	See Section 3
VAPOR DENSITY	HEAVIER THAN AIR
RELATIVE DENSITY(lbs/gal)	9.5684
SOLUBILITY	SOLUBLE IN WATER
AUTOIGNITION TEMP	>500 degrees Fahrenheit
DECOMPOSITION TEMP	(Not Determined)
VISCOSITY	30-35#3 ZAHN

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10.0 STABILITY AND REACTIVITY

CHEMICAL STABILITY: Stable under normal storage conditions.
HAZARDOUS POLYMERIZATION: Will not occur.
CONDITIONS TO AVOID: Avoid freezing, avoid high heat. Never use pressure to empty. Do not drag, puncture or drop containers. Do not stack pails over 4 high.
INCOMPATIBILITIES: Keep away from all oxidizing materials. May form explosive peroxides of unknown stability. Material can react violently with strong oxidizing agents.
HAZARDOUS DECOMPOSITION PRODUCTS: May decompose to oxides of carbon, nitrogen, phosphorous, chlorine and/or sulphur. May also break down to release other irritating or toxic fumes if exposed to fire conditions.
ADDITIONAL DECOMPOSITION PRODUCTS: Gases containing chlorine and fluorine may be produced.

11.0 TOXICOLOGICAL INFORMATION

ROUTES OF ENTRY: Ingestion, inhalation, eye contact, skin contact absorption.
ACUTE TOXICITY ORAL: LD50 (rat): >2,000 mg/kg
ACUTE TOXICITY DERMAL: LD50 (rat): >1,000 mg/kg
ACUTE TOXICITY INHALATION: LC50 (rat, 4h): >500 mg/m3
SKIN CORROSION/IRRITATION: Causes skin irritation.
SERIOUS EYE DAMAGE/IRRITATION: Causes serious eye irritation and may cause eye harm.
RESPIRATORY SENSITIZATION: Non-sensitizing.
SKIN SENSITIZATION: Lab animal sensitization. Some cases of sensitization also observed in humans.
SINGLE DOSE TOXICITY: May cause specific target organ toxicity in acute exposures. See specific information in section 2 of this SDS.
REPEATED DOSE TOXICITY: Chronic overexposure may cause damage to the liver, spleen, lymph node and gastrointestinal system. See specific target organs listed in Section 2.
ASPIRATION HAZARD: No data available.
REPRODUCTIVE TOXICITY: Exposure has shown birth defects in laboratory animals. The relevance to humans has not been determined.
GERM CELL MUTAGENICITY: No positive results listed.
OTHER EFFECTS: Repeated or prolonged exposure to some solvents has been associated with permanent brain and central nervous system damage. Intentional misuse by deliberately concentrating and inhaling vapors from this product may be harmful or fatal.
EFFECTS OF OVEREXPOSURE: There is no applicable information available regarding the carcinogen potential for this product as a whole, however any relevant information regarding any ingredient status as a potential, suspect, or confirmed carcinogen is listed in section 11 of the SDS.
CARCINOGEN POTENTIAL: This product contains titanium dioxide which is listed as an IARC Class 2B possible carcinogen. This is for respirable dust exposure only. Liquid colors do not pose a dust hazard. Based upon available studies, titanium dioxide will not cause lung cancer or chronic respiratory diseases in humans at concentrations experienced in the workplace.
Prolonged and continuous exposure to excessive concentration of dust of any kind without using a dust mask may have an adverse pulmonary effect on some people. This overexposure may result in coughing, sputum, and reduced lung capacity. Pre-existing asthmatic conditions may worsen. Persons with lung diseases should not work in dusty areas unless a physician certifies their fitness to wear a respirator. (OSHA 1910.134). Liquids do not pose a dust hazard.
This product contains iron oxide, which is currently listed by OSHA & ACGIH as a fume hazard. Overexposure to dried particles may pose hazards to the eyes, ears & nose. Injury to the skin or mucous membranes can occur by rigorous skin cleaning or direct mechanical abrasion. Long term exposure to dust without respiratory protection may cause siderosis, a benign pneumoconiosis. Liquid products would not pose a dust hazard.

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12.0 ECOLOGICAL INFORMATION

ECOTOXICITY FISH: LC50 (rainbow trout, 4d): > 100 mg/l
ECOTOXICITY AQUATIC PLANTS: EC50 (algae, 3d): > 100 mg/l
ECOTOXICITY AQUATIC INVERTEBRATES: EC50 (daphnia magna, 48h) > 100 mg/l
ECOTOXICITY MICROORGANISMS: EC50 (bacteria, 3h): >1,000 mg/l
PERSISTENCE AND DEGRADABILITY: Partially soluble in water. This product is predicted to partially degrade in soil and water.
BIOACCUMULATION / ACCUMULATION: Very low potential.
MOBILITY IN SOIL: No data available.
OTHER ADVERSE ECOLOGICAL EFFECTS: No data available.

13.0 DISPOSAL INFORMATION

WASTE DISPOSAL: Consult licensed waste handling and/or transportation facility. Follow local, state, provincial and federal waste regulations. Do not incorporate into municipal sewage treatment facilities. Empty containers retain product residue, follow label and SDS warnings even after container is emptied.
CONTAMINATED PACKAGING: Empty remaining contents from containers. Empty containers should be disposed in a safe manner, do not allow residue to enter waterways.

14.0 TRANSPORTATION INFORMATION

PROPER SHIPPING NAME - NOT REGULATED, WATER BASED PRODUCT KEEP FROM FREEZING
SHIPPING LABEL - KEEP FROM FREEZING LABEL

15.0 REGULATORY INFORMATION

SARA 311/312 Hazards:
Acute Health Hazard
Chronic Health Hazard
Due to the presence of water, this product does not sustain combustion - USDOT 49CFR173.120(b)(3)
SARA 302 HAZARDS: No chemicals in this product are subject to the reporting requirements of SARA Title III Section 302.
SARA 304 HAZARDS: No chemicals in this product are subject to the reporting requirements of SARA Title III Section 304.
SARA 313 HAZARDS: This product contains chemical components that are reportable by SARA Title III section 313. They are listed in Section 3 of this Safety Data Sheet.
TSCA: All chemical substances in this product are listed by the Toxic Substance Control Act Inventory as required by 40CFR 700-799. This product complies with TSCA requirements.
CANADA WHMIS CLASSIFICATION:
B3: Combustible Liquid
D1A: Very Toxic Causing Immediate or Serious Effects
D2A: Very Toxic Material Causing Other Toxic Effects possible carcinogen or embryotoxin or mutagen in animals
D2B: Toxic Material Causing Other Toxic Effects Eye and/or Skin irritation on animals
CALIFORNIA PROP 65: **WARNING:** This product contains products known to the State of California to cause cancer and/or birth defects or reproductive harm.
Ethyl Acrylate CAS# 140-88-5 Listed as causing cancer.
Titanium Dioxide CAS# 14362-67-7 (liquid form not listed) (airborne, unbound particles of respirable size only)
This product contains C.I. Pigment Yellow #42 which is on the Pennsylvania Right-to-Know List. CAS# 20344-49-4
This product contains C.I. Pigment Yellow #74 which is on the Pennsylvania Right-to-Know List. CHEMICAL NAME: Butanamide, 2-[(2-methoxy-4-nitrophenyl)azo]-N-(2-methoxy-= phenyl)-3-oxo- CAS# 6358-31-2

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This product contains ethylene glycol monobutyl ether which is on the New Jersey, Massachusetts and Pennsylvania Right-to-Know lists CAS# 111-76-2 (2-butoxyethanol).
This product contains secondary butanol or 2-butyl alcohol which is on the Massachusetts, Pennsylvania and New Jersey Right-to-Know Lists: CAS# 78-92-2
REGULATORY INFORMATION: This product contains trace amounts of arsenic, chromium and nickel. These metals have not been added but are part of the pigment mineral ore. Potential exposure to the California Prop 65 chemicals in this pigment have been determined to be below the No Significant Risk Level (NSRL).

16.0 OTHER INFORMATION

NOTICE: The HMIS rating for this material involves data and interpretations compiled from the various material suppliers of the component ingredients. This information will vary from supplier to supplier. The rating is intended for rapid and general identification of this product's hazards. To adequately deal with the safe handling of this material, all information contained in the SDS must be reviewed as part of an ongoing Hazard Communication Program.
This safety data sheet was prepared to comply with the U.S. OSHA Hazard Communication Standard 29 CFR 1910.1200 and the international GHS recommendations. The most current dated copy supersedes any previous dated information. Older information should be deleted to avoid confusion. VOC data determined by US EPA method 24.
DEFINITIONS: HAP = Hazardous Air Pollutant VHAP = Volatile Hazardous Air Pollutant
PRODUCT OF THE UNITED STATES

HAZARD RATING	0 - MINIMAL	3 - SERIOUS
	1 - SLIGHT	4 - SEVERE
	2 - MODERATE	* - CHRONIC

HMIS RATING HEALTH - * 2 FLAMMABILITY - 0 REACTIVITY - 0

DATE OF PREPARATION 03/16/17
EFFECTIVE DATE 03/16/17
DATE PRINTED 03/29/17

WATSON STANDARD
ISO 9001 - 2008

SAFETY DATA SHEET

Issue Date 11-Apr-2015 **Revision Date** 11-Apr-2015 **Version** 1

1. IDENTIFICATION OF THE SUBSTANCE/PREPARATION AND OF THE COMPANY/UNDERTAKING

Product identifier
Product Code 3104

Recommended use of the chemical and restrictions on use
Recommended Use Reserved for industrial and professional use.

Details of the supplier of the safety data sheet
Supplier Address
Watson Industrial Coatings Co. D.B.A Watson Standard
616 Hite Road
Harwick PA, 15049
724-275-1000

Emergency telephone number
Emergency Telephone Chemtrec 1-800-424-9300

2. HAZARDS IDENTIFICATION

Classification

OSHA Regulatory Status
This material is considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200)

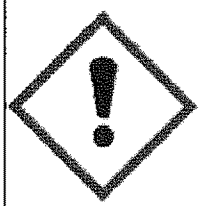
Flammable liquids	Category 4
Skin corrosion/irritation	Category 2
Serious eye damage/eye irritation	Category 2

Hazard symbol(s) /Pictogram(s)

Emergency Overview

Warning

Hazard statements
H315 - Causes skin irritation
H319 - Causes serious eye irritation
H227 - Combustible liquid



Precautionary Statements - Prevention
Wash face, hands and any exposed skin thoroughly after handling
Wear protective gloves/protective clothing/eye protection/face protection
Keep away from heat and sparks - No Smoking

Precautionary Statements - Response
Specific treatment (see .? on this label)
IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing
If eye irritation persists: Get medical advice/attention

IF ON SKIN: Wash with plenty of soap and water
If skin irritation occurs: Get medical advice/attention
Take off contaminated clothing and wash before reuse
IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing
Call a POISON CENTER or doctor/physician if you feel unwell
IF SWALLOWED: Call a POISON CENTER or doctor/physician if you feel unwell
Rinse mouth
In case of fire: Use CO2, dry chemical, or foam for extinction

Precautionary Statements - Storage
Store in a well-ventilated place. Keep cool

Precautionary Statements - Disposal
Dispose of contents/container to an approved waste disposal plant

Hazards not otherwise classified (HNOC)

3. COMPOSITION/INFORMATION ON INGREDIENTS

Chemical Name	CAS No	Weight-%
Titanium Dioxide	13463-67-7	10 - 30
2-Butoxy Ethanol	111-76-2	10 - 30

4. FIRST AID MEASURES

First aid measures

Eye contact IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists: Get medical advice/attention.

Skin Contact Wash off immediately with soap and plenty of water while removing all contaminated clothes and shoes. If symptoms persist, call a physician.

Inhalation Move to fresh air in case of accidental inhalation of vapors. If symptoms persist, call a physician.

Ingestion If swallowed, call a poison control center or physician immediately. Never give anything by mouth to an unconscious person. Do not induce vomiting without medical advice.

5. FIRE-FIGHTING MEASURES

Suitable extinguishing media
Carbon dioxide (CO2). Extinguishing powder. Dry chemical. Alcohol resistant foam. Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.

Specific hazards arising from the chemical
No information available.

Explosion data
Sensitivity to Mechanical Impact No.
Sensitivity to Static Discharge Yes.

Protective equipment and precautions for firefighters
Wear self-contained breathing apparatus and protective suit.

6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures

Personal precautions ELIMINATE all ignition sources (no smoking, flares, sparks or flames in immediate area). Ensure adequate ventilation, especially in confined areas. Avoid contact with skin, eyes or clothing. All equipment used when handling the product must be grounded. Use personal protection recommended in Section 8. Wash thoroughly after handling.

Methods and material for containment and cleaning up

Methods for containment Prevent further leakage or spillage if safe to do so.

Methods for cleaning up Pick up and transfer to properly labeled containers. Soak up with inert absorbent material. Clean contaminated surface thoroughly. Prevent product from entering drains. Take precautionary measures against static discharges. Sweep up and shovel into suitable containers for disposal.

7. HANDLING AND STORAGE

Precautions for safe handling

Advice on safe handling Avoid contact with skin, eyes or clothing. Do not breathe dust/fume/gas/mist/vapors/spray. Wash contaminated clothing before reuse. Take precautionary measures against static discharges. Use spark-proof tools and explosion-proof equipment. Ensure adequate ventilation, especially in confined areas. Remove all sources of ignition. Keep away from heat/sparks/open flames/hot surfaces. — No smoking. Do not eat, drink or smoke when using this product. Wash thoroughly after handling. Never pierce, drill, grind, cut, saw or weld any empty container.

Conditions for safe storage, including any incompatibilities

Storage Conditions Keep containers tightly closed in a dry, cool and well-ventilated place.

Incompatible materials Strong oxidizing agents. Strong acids. Strong bases.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Control parameters

Chemical Name	ACGIH TLV	OSHA PEL	NIOSH IDLH	Exposure Limits
Titanium Dioxide 13463-67-7	TWA: 10 mg/m³	TWA: 15 mg/m³ total dust (vacated) TWA: 10 mg/m³ total dust	IDLH: 5000 mg/m³	Mexico: TWA 10 mg/m³ Mexico: STEL 20 mg/m³
2-Butoxy Ethanol 111-76-2	TWA: 20 ppm	TWA: 50 ppm TWA: 240 mg/m³ (vacated) TWA: 25 ppm (vacated) TWA: 120 mg/m³ (vacated) S* S*	IDLH: 700 ppm TWA: 5 ppm TWA: 24 mg/m³	Mexico: TWA 26 ppm Mexico: TWA 120 mg/m³ Mexico: STEL 75 ppm Mexico: STEL 360 mg/m³

NIOSH IDLH Immediately Dangerous to Life or Health

Other Information Vacated limits revoked by the Court of Appeals decision in AFL-CIO v. OSHA, 965 F.2d 962 (11th Cir., 1992).

Appropriate engineering controls

Engineering Controls Showers
Eyewash stations
Ventilation systems.

Individual protection measures, such as personal protective equipment

Eye/face protection Wear safety glasses with side shields (or goggles).

Skin and body protection	Wear impervious protective clothing, including boots, gloves, lab coat, apron or coveralls, as appropriate, to prevent skin contact.
Respiratory protection	If exposure limits are exceeded or irritation is experienced, NIOSH/MSHA approved respiratory protection should be worn. Positive-pressure supplied air respirators may be required for high airborne contaminant concentrations. Respiratory protection must be provided in accordance with current local regulations.
General Hygiene Considerations	Handle in accordance with good industrial hygiene and safety practice.

9. PHYSICAL AND CHEMICAL PROPERTIES

Information on basic physical and chemical properties

Physical state	liquid
Odor	Amines
Color	opaque, White

Property	Values	Remarks • Method
pH	No information available	
Melting point/freezing point	No information available	
Boiling point / boiling range	No information available	
Flash Point	65.5 °C / 146.3 °F	Pensky-Martens Closed Cup (PMCC)
Evaporation rate	No information available	
Flammability (solid, gas)	No information available	
Flammability Limit in Air		
Upper flammability limit:	No information available	
Lower flammability limit:	No information available	
Vapor pressure	No information available	
Vapor density	No information available	
Specific Gravity	1.16	
Water solubility	Soluble in water	
Solubility in other solvents	No information available	
Partition coefficient	No information available	
Autoignition temperature	No information available	
Decomposition temperature	No information available	
Viscosity	No information available	
Explosive properties	No information available	
Oxidizing properties	No information available	

Other Information

Softening point	No information available
Molecular weight	No information available
VOC Content (%)	No information available
Density	9.63 lb/gal +/- 0.2
Bulk density	No information available

10. STABILITY AND REACTIVITY

Reactivity
Not Applicable

Chemical stability
Stable under normal conditions.

Possibility of Hazardous Reactions
None under normal processing.

Hazardous polymerization	Hazardous polymerization does not occur.

Conditions to avoid
Heat, flames and sparks.

Incompatible materials
Strong oxidizing agents. Strong acids. Strong bases.

Hazardous Decomposition Products
None under normal use conditions. Thermal decomposition can lead to release of irritating and toxic gases and vapors. Carbon dioxide (CO2). Hydrocarbons.

11. TOXICOLOGICAL INFORMATION

Information on likely routes of exposure

Product Information No data available

Inhalation No data available.

Eye contact No data available.

Skin Contact No data available.

Ingestion No data available.

Chemical Name	Oral LD50	Dermal LD50	Inhalation LC50
Titanium Dioxide 13463-67-7	> 10000 mg/kg (Rat)	-	-
2-Butoxy Ethanol 111-76-2	= 470 mg/kg (Rat)	= 220 mg/kg (Rabbit)	= 450 ppm (Rat) 4 h

Information on toxicological effects

Symptoms No information available.

Delayed and immediate effects as well as chronic effects from short and long-term exposure

Sensitization No information available.
Germ cell mutagenicity No information available.
Carcinogenicity This product contains one or more substances which are classified by IARC as carcinogenic to humans (Group I), probably carcinogenic to humans (Group 2A) or possibly carcinogenic to humans (Group 2B). This product contains titanium dioxide which is classified as a possible carcinogen when present as respirable dust. This is not relevant for this product since it is a liquid.

Chemical Name	ACGIH	IARC	NTP	OSHA	Mexico
Titanium Dioxide 13463-67-7	-	Group 2B	-	X	-
2-Butoxy Ethanol 111-76-2	A3	Group 3	-	-	-

ACGIH (American Conference of Governmental Industrial Hygienists)
A3 - Animal Carcinogen
IARC (International Agency for Research on Cancer)
Group 2B - Possibly Carcinogenic to Humans
Not classifiable as a human carcinogen
OSHA (Occupational Safety and Health Administration of the US Department of Labor)
X - Present

Reproductive toxicity No information available.
STOT - single exposure No information available.
STOT - repeated exposure No information available.
Aspiration hazard No information available.

Numerical measures of toxicity - Product Information

Unknown Acute Toxicity 0.93690497% of the mixture consists of ingredient(s) of unknown toxicity
The following values are calculated based on chapter 3.1 of the GHS document .

12. ECOLOGICAL INFORMATION

Ecotoxicity

1.93354% of the mixture consists of components(s) of unknown hazards to the aquatic environment

Chemical Name	Algae/aquatic plants	Fish	Crustacea
2-Butoxy Ethanol 111-76-2	-	1490: 96 h Lepomis macrochirus mg/L LC50 static 2950: 96 h Lepomis macrochirus mg/L LC50	1000: 48 h Daphnia magna mg/L EC50 1698 - 1940: 24 h Daphnia magna mg/L EC50

Persistence and degradability
No information available.

Bioaccumulation
No information available.

Chemical Name	Partition coefficient
2-Butoxy Ethanol 111-76-2	0.81

Other adverse effects No information available

13. DISPOSAL CONSIDERATIONS

Waste treatment methods

Disposal of wastes Residual vapors may explode on ignition. Never pierce, drill, grind, cut, saw or weld any empty container. Disposal should be in accordance with applicable regional, national and local laws and regulations. Since empty containers retain product residue, follow label warnings even after container is emptied.

14. TRANSPORT INFORMATION

Note: DOT Ground - "Non-bulk shipments may be non-regulated per 49CFR 173.150(f)(2)"

DOT

UN/ID No.	NA1263
Proper shipping name	Paint, combustible
Hazard Class	Combustible liquid
Packing Group	III

TDG Not regulated

MEX Not regulated

IATA Not regulated

IMDG Not regulated

15. REGULATORY INFORMATION

International Inventories

TSCA	Complies
DSL/NDSL	Not Determined
EINECS/ELINCS	Not Determined
ENCS	Not Determined
IECSC	Not Determined
KECL	Not Determined
PICCS	Not Determined
AICS	Not Determined

Legend:
TSCA - United States Toxic Substances Control Act Section 8(b) Inventory
DSL/NDSL - Canadian Domestic Substances List/Non-Domestic Substances List
EINECS/ELINCS - European Inventory of Existing Chemical Substances/European List of Notified Chemical Substances
ENCS - Japan Existing and New Chemical Substances
IECSC - China Inventory of Existing Chemical Substances
KECL - Korean Existing and Evaluated Chemical Substances
PICCS - Philippines Inventory of Chemicals and Chemical Substances
AICS - Australian Inventory of Chemical Substances

US Federal Regulations

SARA 313

Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA). This product contains a chemical or chemicals which are subject to the reporting requirements of the Act and Title 40 of the Code of Federal Regulations, Part 372

Chemical Name	SARA 313 - Threshold Values %
2-Butoxy Ethanol - 111-76-2	1.0

SARA 311/312 Hazard Categories

Acute health hazard	Yes
Chronic Health Hazard	Yes
Fire hazard	Yes
Sudden release of pressure hazard	No
Reactive Hazard	No

US State Regulations

This product may contain substances regulated by state right-to-know regulations

Chemical Name	New Jersey	Massachusetts	Pennsylvania	Pennsylvania - Special Hazardous Substances	Pennsylvania - Environmental Hazard List
Titanium Dioxide 13463-67-7	X	X	X	-	-
2-Butoxy Ethanol 111-76-2	X	X	X	-	-
Triethylamine 121-44-8	X	X	X	-	X
Silica, amorphous precipitated 112926-00-8	X	X	X	-	-
Aluminum oxide (Al2O3) 1344-28-1	X	X	X	-	X
Stoddard solvent, solvent naphta 8052-41-3	X	X	X	-	-
Ethanol, 2-(dimethylamino)- 108-01-0	X	X	X	-	-
2-Propanol 67-63-0	X	X	X	-	X
Cumene 98-82-8	X	X	X	-	X
Naphthalene 91-20-3	X	X	X	-	X
Ethylbenzene 100-41-4	X	X	X	-	X

16. OTHER INFORMATION

Issue Date 11-Apr-2015

Revision Date 11-Apr-2015
Revision Note No information available

Disclaimer

The information contained herein is derived from data provided by suppliers and other sources believed to be reliable, and is furnished without warranty of any kind. The information relating to the product is for guidance purposes only, is based only on downstream uses known to Watson Standard, and may not be valid for the product used in combination with any other materials. Users of this product must make determinations of suitability and completeness of information from this and all other sources to ensure proper use and disposal of this product, safety and health of employees, customers, and the protection of the environment. Watson Standard will not be liable for any special, incidental, or consequential damages associated with the use or handling of the product.

End of Safety Data Sheet

WATSON STANDARD
ISO 9001 - 2008

SAFETY DATA SHEET

Issue Date 08-Apr-2015 **Revision Date** 08-Apr-2015 **Version** 1

1. IDENTIFICATION OF THE SUBSTANCE/PREPARATION AND OF THE COMPANY/UNDERTAKING

Product identifier
Product Code 3223

Recommended use of the chemical and restrictions on use
Recommended Use Reserved for industrial and professional use.

Details of the supplier of the safety data sheet
Supplier Address
Watson Standard Company
616 Hite Road
Harwick, PA 15049
724-275-1000

Emergency telephone number
Emergency Telephone Chemtrec 1-800-424-9300

2. HAZARDS IDENTIFICATION

Classification

OSHA Regulatory Status
This material is considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200)

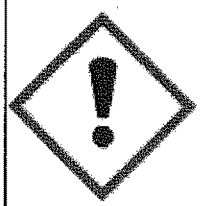
Flammable liquids	Category 4
Skin corrosion/irritation	Category 2
Serious eye damage/eye irritation	Category 2
Specific target organ toxicity (single exposure)	Category 3

Hazard symbol(s) /Pictogram(s)

Emergency Overview

Warning

Hazard statements
H315 - Causes skin irritation
H319 - Causes serious eye irritation
H335 - May cause respiratory irritation
H336 - May cause drowsiness or dizziness
H227 - Combustible liquid



Precautionary Statements - Prevention
Wash face, hands and any exposed skin thoroughly after handling
Wear protective gloves/protective clothing/eye protection/face protection
Avoid breathing dust/fume/gas/mist/vapors/spray
Use only outdoors or in a well-ventilated area
Keep away from heat and sparks - No Smoking
Keep cool

Precautionary Statements - Response
Specific treatment (see .? on this label)
IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing
If eye irritation persists: Get medical advice/attention
IF ON SKIN: Wash with plenty of soap and water
If skin irritation occurs: Get medical advice/attention
Take off contaminated clothing and wash before reuse
IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing
Call a POISON CENTER or doctor/physician if you feel unwell
IF SWALLOWED: Call a POISON CENTER or doctor/physician if you feel unwell
Rinse mouth
In case of fire: Use CO2, dry chemical, or foam for extinction

Precautionary Statements - Storage
Store in a well-ventilated place. Keep container tightly closed
Store locked up

Precautionary Statements - Disposal
Dispose of contents/container to an approved waste disposal plant

Hazards not otherwise classified (HNOC)

3. COMPOSITION/INFORMATION ON INGREDIENTS

Chemical Name	CAS No	Weight-%
2-Butoxy Ethanol	111-76-2	10 - 30
Iron oxide (Fe2O3)	1309-37-1	1 - 5
Titanium Dioxide	13463-67-7	1 - 5
Triethylamine	121-44-8	1 - 5

4. FIRST AID MEASURES

First aid measures

Eye contact IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists: Get medical advice/attention.

Skin Contact Wash off immediately with soap and plenty of water while removing all contaminated clothes and shoes. If symptoms persist, call a physician.

Inhalation Move to fresh air in case of accidental inhalation of vapors. If symptoms persist, call a physician.

Ingestion If swallowed, call a poison control center or physician immediately. Never give anything by mouth to an unconscious person. Do not induce vomiting without medical advice.

5. FIRE-FIGHTING MEASURES

Suitable extinguishing media
Carbon dioxide (CO2). Extinguishing powder. Dry chemical. Alcohol resistant foam. Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.

Specific hazards arising from the chemical
No information available.

Explosion data

Sensitivity to Mechanical Impact No.
Sensitivity to Static Discharge Yes.

Protective equipment and precautions for firefighters
Wear self-contained breathing apparatus and protective suit.

6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures

Personal precautions ELIMINATE all ignition sources (no smoking, flares, sparks or flames in immediate area). Ensure adequate ventilation, especially in confined areas. Avoid contact with skin, eyes or clothing. All equipment used when handling the product must be grounded. Use personal protection recommended in Section 8. Wash thoroughly after handling.

Methods and material for containment and cleaning up

Methods for containment Prevent further leakage or spillage if safe to do so.

Methods for cleaning up Pick up and transfer to properly labeled containers. Soak up with inert absorbent material. Clean contaminated surface thoroughly. Prevent product from entering drains. Take precautionary measures against static discharges. Sweep up and shovel into suitable containers for disposal.

7. HANDLING AND STORAGE

Precautions for safe handling

Advice on safe handling Avoid contact with skin, eyes or clothing. Do not breathe dust/fume/gas/mist/vapors/spray. Wash contaminated clothing before reuse. Take precautionary measures against static discharges. Use spark-proof tools and explosion-proof equipment. Ensure adequate ventilation, especially in confined areas. Remove all sources of ignition. Keep away from heat/sparks/open flames/hot surfaces. — No smoking. Do not eat, drink or smoke when using this product. Wash thoroughly after handling. Never pierce, drill, grind, cut, saw or weld any empty container.

Conditions for safe storage, including any incompatibilities

Storage Conditions Keep containers tightly closed in a dry, cool and well-ventilated place.

Incompatible materials Strong oxidizing agents. Strong acids. Strong bases.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Control parameters

Chemical Name	ACGIH TLV	OSHA PEL	NIOSH IDLH	Exposure Limits
2-Butoxy Ethanol 111-76-2	TWA: 20 ppm	TWA: 50 ppm TWA: 240 mg/m³ (vacated) TWA: 25 ppm (vacated) TWA: 120 mg/m³ (vacated) S* S*	IDLH: 700 ppm TWA: 5 ppm TWA: 24 mg/m³	Mexico: TWA 26 ppm Mexico: TWA 120 mg/m³ Mexico: STEL 75 ppm Mexico: STEL 360 mg/m³
Iron oxide (Fe2O3) 1309-37-1	TWA: 5 mg/m³ respirable fraction	TWA: 10 mg/m³ fume TWA: 15 mg/m³ total dust TWA: 5 mg/m³ respirable fraction (vacated) TWA: 10 mg/m³ fume and total dust Iron oxide (vacated) TWA: 5 mg/m³ respirable fraction regulated under Rouge	IDLH: 2500 mg/m³ Fe dust and fume TWA: 5 mg/m³ Fe dust and fume	Mexico: TWA 5 mg/m³ Mexico: STEL 10 mg/m³

Titanium Dioxide 13463-67-7	TWA: 10 mg/m³	TWA: 15 mg/m³ total dust (vacated) TWA: 10 mg/m³ total dust	IDLH: 5000 mg/m³	Mexico: TWA 10 mg/m³ Mexico: STEL 20 mg/m³
Triethylamine 121-44-8	STEL: 3 ppm TWA: 1 ppm S*	TWA: 25 ppm TWA: 100 mg/m³ (vacated) TWA: 10 ppm (vacated) TWA: 40 mg/m³ (vacated) STEL: 15 ppm (vacated) STEL: 60 mg/m³	IDLH: 200 ppm	Mexico: TWA 25 ppm Mexico: TWA 100 mg/m³ Mexico: STEL 40 ppm Mexico: STEL 160 mg/m³

NIOSH IDLH Immediately Dangerous to Life or Health

Other Information Vacated limits revoked by the Court of Appeals decision in AFL-CIO v. OSHA, 965 F.2d 962 (11th Cir., 1992).

Appropriate engineering controls

Engineering Controls Showers
Eyewash stations
Ventilation systems.

Individual protection measures, such as personal protective equipment

Eye/face protection Wear safety glasses with side shields (or goggles).

Skin and body protection Wear impervious protective clothing, including boots, gloves, lab coat, apron or coveralls, as appropriate, to prevent skin contact.

Respiratory protection If exposure limits are exceeded or irritation is experienced, NIOSH/MSHA approved respiratory protection should be worn. Positive-pressure supplied air respirators may be required for high airborne contaminant concentrations. Respiratory protection must be provided in accordance with current local regulations.

General Hygiene Considerations Handle in accordance with good industrial hygiene and safety practice.

9. PHYSICAL AND CHEMICAL PROPERTIES

Information on basic physical and chemical properties

Physical state liquid
Odor Amines
Color opaque, red

Property	Values	Remarks • Method
pH	No information available	
Melting point/freezing point	No information available	
Boiling point / boiling range	No information available	
Flash Point	65.5 °C / 150 °F	Pensky-Martens Closed Cup (PMCC)
Evaporation rate	No information available	
Flammability (solid, gas)	No information available	
Flammability Limit in Air		
Upper flammability limit:	No information available	
Lower flammability limit:	No information available	
Vapor pressure	No information available	
Vapor density	No information available	
Specific Gravity	1.06	
Water solubility	Soluble in water	
Solubility in other solvents	No information available	
Partition coefficient	No information available	
Autoignition temperature	No information available	
Decomposition temperature	No information available	
Viscosity	No information available	
Explosive properties	No information available	
Oxidizing properties	No information available	

Other Information

Softening point	No information available
Molecular weight	No information available
VOC Content (%)	No information available
Density	8.79 lb/gal
Bulk density	No information available

10. STABILITY AND REACTIVITY

Reactivity
Not Applicable

Chemical stability
Stable under normal conditions.

Possibility of Hazardous Reactions
None under normal processing.

Hazardous polymerization Hazardous polymerization does not occur.

Conditions to avoid
Heat, flames and sparks.

Incompatible materials
Strong oxidizing agents. Strong acids. Strong bases.

Hazardous Decomposition Products
None under normal use conditions. Thermal decomposition can lead to release of irritating and toxic gases and vapors. Carbon dioxide (CO2). Hydrocarbons.

11. TOXICOLOGICAL INFORMATION

Information on likely routes of exposure

Product Information No data available

Inhalation No data available.

Eye contact No data available.

Skin Contact No data available.

Ingestion No data available.

Chemical Name	Oral LD50	Dermal LD50	Inhalation LC50
2-Butoxy Ethanol 111-76-2	= 470 mg/kg (Rat)	= 220 mg/kg (Rabbit)	= 450 ppm (Rat) 4 h
Iron oxide (Fe2O3) 1309-37-1	> 10000 mg/kg (Rat)	-	-
Titanium Dioxide 13463-67-7	> 10000 mg/kg (Rat)	-	-
Triethylamine 121-44-8	= 460 mg/kg (Rat)	= 416 mg/kg (Rabbit) = 570 µL/kg (Rabbit)	= 0.42 mg/L (Rat) 1 h

Information on toxicological effects

Symptoms No information available.

Delayed and immediate effects as well as chronic effects from short and long-term exposure

Sensitization No information available.

Germ cell mutagenicity No information available.

Carcinogenicity This product contains one or more substances which are classified by IARC as carcinogenic to humans (Group I), probably carcinogenic to humans (Group 2A) or possibly carcinogenic to humans (Group 2B). This product contains titanium dioxide which is classified as a possible carcinogen when present as respirable dust. This is not relevant for this product since it is a liquid.

Chemical Name	ACGIH	IARC	NTP	OSHA	Mexico
2-Butoxy Ethanol 111-76-2	A3	Group 3	-	-	-
Iron oxide (Fe2O3) 1309-37-1	-	Group 3	-	-	-
Titanium Dioxide 13463-67-7	-	Group 2B	-	X	-

ACGIH (American Conference of Governmental Industrial Hygienists)
A3 - Animal Carcinogen
IARC (International Agency for Research on Cancer)
Group 2B - Possibly Carcinogenic to Humans
Not classifiable as a human carcinogen
NTP (National Toxicology Program)
Known - Known Carcinogen
OSHA (Occupational Safety and Health Administration of the US Department of Labor)
X - Present

Reproductive toxicity No information available.
STOT - single exposure No information available.
STOT - repeated exposure No information available.
Aspiration hazard No information available.

Numerical measures of toxicity - Product Information

Unknown Acute Toxicity 4.48338425% of the mixture consists of ingredient(s) of unknown toxicity
The following values are calculated based on chapter 3.1 of the GHS document .

12. ECOLOGICAL INFORMATION

Ecotoxicity

7.63378% of the mixture consists of components(s) of unknown hazards to the aquatic environment

Chemical Name	Algae/aquatic plants	Fish	Crustacea
2-Butoxy Ethanol 111-76-2	-	1490: 96 h Lepomis macrochirus mg/L LC50 static 2950: 96 h Lepomis macrochirus mg/L LC50	1000: 48 h Daphnia magna mg/L EC50 1698 - 1940: 24 h Daphnia magna mg/L EC50
Triethylamine 121-44-8	-	43.7: 96 h Pimephales promelas mg/L LC50 static	200: 48 h Daphnia magna mg/L EC50

Persistence and degradability
No information available.

Bioaccumulation
No information available.

Chemical Name	Partition coefficient
2-Butoxy Ethanol 111-76-2	0.81
Triethylamine 121-44-8	1.45

Other adverse effects No information available

13. DISPOSAL CONSIDERATIONS

Waste treatment methods

Disposal of wastes

Residual vapors may explode on ignition. Never pierce, drill, grind, cut, saw or weld any empty container. Disposal should be in accordance with applicable regional, national and local laws and regulations. Since empty containers retain product residue, follow label warnings even after container is emptied.

14. TRANSPORT INFORMATION

Note: DOT Ground - "Non-bulk shipments may be non-regulated per 49CFR 173.150(f)(2)"

DOT

UN/ID No.	NA1263
Proper shipping name	Paint, combustible
Hazard Class	Combustible liquid
Packing Group	III

TDG Not regulated

MEX Not regulated

IATA Not regulated

IMDG Not regulated

15. REGULATORY INFORMATION

International Inventories

TSCA	Complies
DSL/NDSL	Not Determined
EINECS/ELINCS	Not Determined
ENCS	Not Determined
IECSC	Not Determined
KECL	Not Determined
PICCS	Not Determined
AICS	Not Determined

Legend:

TSCA - United States Toxic Substances Control Act Section 8(b) Inventory
DSL/NDSL - Canadian Domestic Substances List/Non-Domestic Substances List
EINECS/ELINCS - European Inventory of Existing Chemical Substances/European List of Notified Chemical Substances
ENCS - Japan Existing and New Chemical Substances
IECSC - China Inventory of Existing Chemical Substances
KECL - Korean Existing and Evaluated Chemical Substances
PICCS - Philippines Inventory of Chemicals and Chemical Substances
AICS - Australian Inventory of Chemical Substances

US Federal Regulations

SARA 313

Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA). This product contains a chemical or chemicals which are subject to the reporting requirements of the Act and Title 40 of the Code of Federal Regulations, Part 372

Chemical Name	SARA 313 - Threshold Values %
2-Butoxy Ethanol - 111-76-2	1.0
Triethylamine - 121-44-8	1.0

SARA 311/312 Hazard Categories

Acute health hazard	Yes
Chronic Health Hazard	Yes
Fire hazard	Yes
Sudden release of pressure hazard	No
Reactive Hazard	No

US State Regulations

This product may contain substances regulated by state right-to-know regulations

Chemical Name	New Jersey	Massachusetts	Pennsylvania	Pennsylvania - Special Hazardous Substances	Pennsylvania - Environmental Hazard List
2-Butoxy Ethanol 111-76-2	X	X	X	-	-
Iron oxide (Fe2O3) 1309-37-1	X	X	X	-	-
Titanium Dioxide 13463-67-7	X	X	X	-	-
Triethylamine 121-44-8	X	X	X	-	X
Stoddard solvent, solvent naphta 8052-41-3	X	X	X	-	-
Ethanol, 2-(dimethylamino)- 108-01-0	X	X	X	-	-
2-Propanol 67-63-0	X	X	X	-	X
2-Methoxymethylethoxy propanol 34590-94-8	X	X	X	-	-
Ethylbenzene 100-41-4	X	X	X	-	X
Chromium 7440-47-3	X	X	X	X	X
Nickel 7440-02-0	X	X	X	X	X

16. OTHER INFORMATION

Issue Date 08-Apr-2015
Revision Date 08-Apr-2015
Revision Note No information available

Disclaimer

The information contained herein is derived from data provided by suppliers and other sources believed to be reliable, and is furnished without warranty of any kind. The information relating to the product is for guidance purposes only, is based only on downstream uses known to Watson Standard, and may not be valid for the product used in combination with any other materials. Users of this product must make determinations of suitability and completeness of information from this and all other sources to ensure proper use and disposal of this product, safety and health of employees, customers, and the protection of the environment. Watson Standard will not be liable for any special, incidental, or consequential damages associated with the use or handling of the product.

End of Safety Data Sheet

WATSON STANDARD
ISO 9001 - 2008

SAFETY DATA SHEET

Issue Date 01-Jul-2015 **Revision Date** 01-Jul-2015 **Version** 1

1. IDENTIFICATION OF THE SUBSTANCE/PREPARATION AND OF THE COMPANY/UNDERTAKING

Product identifier
Product Code 3229

Recommended use of the chemical and restrictions on use
Recommended Use Reserved for industrial and professional use.

Details of the supplier of the safety data sheet
Supplier Address
Watson Industrial Coatings Co. D.B.A Watson Standard
616 Hite Road
Harwick PA, 15049
724-275-1000

Emergency telephone number
Emergency Telephone Chemtrec 1-800-424-9300

2. HAZARDS IDENTIFICATION

Classification

OSHA Regulatory Status
This material is considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200)

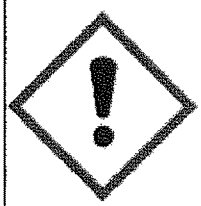
Flammable liquids	Category 4
Skin corrosion/irritation	Category 2
Serious eye damage/eye irritation	Category 2

Hazard symbol(s) /Pictogram(s)

Emergency Overview

Warning

Hazard statements
H315 - Causes skin irritation
H319 - Causes serious eye irritation
H227 - Combustible liquid



Precautionary Statements - Prevention
Wash face, hands and any exposed skin thoroughly after handling
Wear protective gloves/protective clothing/eye protection/face protection
Keep away from heat and sparks - No Smoking

Precautionary Statements - Response
Specific treatment (see .? on this label)
IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing
If eye irritation persists: Get medical advice/attention

IF ON SKIN: Wash with plenty of soap and water
If skin irritation occurs: Get medical advice/attention
Take off contaminated clothing and wash before reuse
IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing
Call a POISON CENTER or doctor/physician if you feel unwell
IF SWALLOWED: Call a POISON CENTER or doctor/physician if you feel unwell
Rinse mouth
In case of fire: Use CO2, dry chemical, or foam for extinction

Precautionary Statements - Storage
Store in a well-ventilated place. Keep cool

Precautionary Statements - Disposal
Dispose of contents/container to an approved waste disposal plant

Hazards not otherwise classified (HNOC)

3. COMPOSITION/INFORMATION ON INGREDIENTS

Chemical Name	CAS No	Weight-%
2-Butoxy Ethanol	111-76-2	10 - 30
Trade Secret Additive	Proprietary	5 - 10
Titanium Dioxide	13463-67-7	0.1 - 1

4. FIRST AID MEASURES

First aid measures

Eye contact IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists: Get medical advice/attention.

Skin Contact Wash off immediately with soap and plenty of water while removing all contaminated clothes and shoes. If symptoms persist, call a physician.

Inhalation Move to fresh air in case of accidental inhalation of vapors. If symptoms persist, call a physician.

Ingestion If swallowed, call a poison control center or physician immediately. Never give anything by mouth to an unconscious person. Do not induce vomiting without medical advice.

5. FIRE-FIGHTING MEASURES

Suitable extinguishing media
Carbon dioxide (CO2). Extinguishing powder. Dry chemical. Alcohol resistant foam. Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.

Specific hazards arising from the chemical
No information available.

Explosion data
Sensitivity to Mechanical Impact No.
Sensitivity to Static Discharge Yes.

Protective equipment and precautions for firefighters
Wear self-contained breathing apparatus and protective suit.

6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures

Personal precautions ELIMINATE all ignition sources (no smoking, flares, sparks or flames in immediate area). Ensure adequate ventilation, especially in confined areas. Avoid contact with skin, eyes or clothing. All equipment used when handling the product must be grounded. Use personal protection recommended in Section 8. Wash thoroughly after handling.

Methods and material for containment and cleaning up

Methods for containment Prevent further leakage or spillage if safe to do so.

Methods for cleaning up Pick up and transfer to properly labeled containers. Soak up with inert absorbent material. Clean contaminated surface thoroughly. Prevent product from entering drains. Take precautionary measures against static discharges. Sweep up and shovel into suitable containers for disposal.

7. HANDLING AND STORAGE

Precautions for safe handling

Advice on safe handling Avoid contact with skin, eyes or clothing. Do not breathe dust/fume/gas/mist/vapors/spray. Wash contaminated clothing before reuse. Take precautionary measures against static discharges. Use spark-proof tools and explosion-proof equipment. Ensure adequate ventilation, especially in confined areas. Remove all sources of ignition. Keep away from heat/sparks/open flames/hot surfaces. — No smoking. Do not eat, drink or smoke when using this product. Wash thoroughly after handling. Never pierce, drill, grind, cut, saw or weld any empty container.

Conditions for safe storage, including any incompatibilities

Storage Conditions Keep containers tightly closed in a dry, cool and well-ventilated place.

Incompatible materials Strong oxidizing agents. Strong acids. Strong bases.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Control parameters

Chemical Name	ACGIH TLV	OSHA PEL	NIOSH IDLH	Exposure Limits
2-Butoxy Ethanol 111-76-2	TWA: 20 ppm	TWA: 50 ppm TWA: 240 mg/m³ (vacated) TWA: 25 ppm (vacated) TWA: 120 mg/m³ (vacated) S* S*	IDLH: 700 ppm TWA: 5 ppm TWA: 24 mg/m³	Mexico: TWA 26 ppm Mexico: TWA 120 mg/m³ Mexico: STEL 75 ppm Mexico: STEL 360 mg/m³
Trade Secret Additive	TWA: 5 mg/m³ respirable fraction	TWA: 10 mg/m³ fume TWA: 15 mg/m³ total dust TWA: 5 mg/m³ respirable fraction (vacated) TWA: 10 mg/m³ fume and total dust Iron oxide (vacated) TWA: 5 mg/m³ respirable fraction regulated under Rouge	IDLH: 2500 mg/m³ Fe dust and fume TWA: 5 mg/m³ Fe dust and fume	Mexico: TWA 5 mg/m³ Mexico: STEL 10 mg/m³
Titanium Dioxide 13463-67-7	TWA: 10 mg/m³	TWA: 15 mg/m³ total dust (vacated) TWA: 10 mg/m³ total dust	IDLH: 5000 mg/m³	Mexico: TWA 10 mg/m³ Mexico: STEL 20 mg/m³

NIOSH IDLH Immediately Dangerous to Life or Health

Other Information Vacated limits revoked by the Court of Appeals decision in AFL-CIO v. OSHA, 965 F.2d 962 (11th Cir., 1992).

Appropriate engineering controls

Engineering Controls	Showers Eyewash stations Ventilation systems.

Individual protection measures, such as personal protective equipment

Eye/face protection	Wear safety glasses with side shields (or goggles).
Skin and body protection	Wear impervious protective clothing, including boots, gloves, lab coat, apron or coveralls, as appropriate, to prevent skin contact.
Respiratory protection	If exposure limits are exceeded or irritation is experienced, NIOSH/MSHA approved respiratory protection should be worn. Positive-pressure supplied air respirators may be required for high airborne contaminant concentrations. Respiratory protection must be provided in accordance with current local regulations.
General Hygiene Considerations	Handle in accordance with good industrial hygiene and safety practice.

9. PHYSICAL AND CHEMICAL PROPERTIES

Information on basic physical and chemical properties

Physical state	liquid
Odor	Amines
Color	opaque, red

Property	Values	Remarks • Method
pH	No information available	
Melting point/freezing point	No information available	
Boiling point / boiling range	No information available	
Flash Point	61.0 °C / 141.80 °F	Pensky-Martens Closed Cup (PMCC)
Evaporation rate	No information available	
Flammability (solid, gas)	No information available	
Flammability Limit in Air		
Upper flammability limit:	No information available	
Lower flammability limit:	No information available	
Vapor pressure	No information available	
Vapor density	No information available	
Specific Gravity	1.04	
Water solubility	Soluble in water	
Solubility in other solvents	No information available	
Partition coefficient	No information available	
Autoignition temperature	No information available	
Decomposition temperature	No information available	
Viscosity	No information available	
Explosive properties	No information available	
Oxidizing properties	No information available	

Other Information

Softening point	No information available
Molecular weight	No information available
VOC Content (%)	No information available
Density	8.70 lb/gal +/- 0.20
Bulk density	No information available

10. STABILITY AND REACTIVITY

Reactivity
Not Applicable

Chemical stability
Stable under normal conditions.

Possibility of Hazardous Reactions
None under normal processing.

Hazardous polymerization Hazardous polymerization does not occur.

Conditions to avoid
Heat, flames and sparks.

Incompatible materials
Strong oxidizing agents. Strong acids. Strong bases.

Hazardous Decomposition Products
None under normal use conditions. Thermal decomposition can lead to release of irritating and toxic gases and vapors. Carbon dioxide (CO2). Hydrocarbons.

11. TOXICOLOGICAL INFORMATION

Information on likely routes of exposure

Product Information No data available

Inhalation No data available.

Eye contact No data available.

Skin Contact No data available.

Ingestion No data available.

Chemical Name	Oral LD50	Dermal LD50	Inhalation LC50
2-Butoxy Ethanol 111-76-2	= 470 mg/kg (Rat)	= 99 mg/kg (Rabbit)	= 450 ppm (Rat) 4 h
Trade Secret Additive	> 10000 mg/kg (Rat)	-	-
Titanium Dioxide 13463-67-7	> 10000 mg/kg (Rat)	-	-

Information on toxicological effects

Symptoms No information available.

Delayed and immediate effects as well as chronic effects from short and long-term exposure

Sensitization No information available.
Germ cell mutagenicity No information available.
Carcinogenicity This product contains one or more substances which are classified by IARC as carcinogenic to humans (Group I), probably carcinogenic to humans (Group 2A) or possibly carcinogenic to humans (Group 2B). This product contains titanium dioxide which is classified as a possible carcinogen when present as respirable dust. This is not relevant for this product since it is a liquid.

Chemical Name	ACGIH	IARC	NTP	OSHA	Mexico
2-Butoxy Ethanol 111-76-2	A3	Group 3	-	-	-
Trade Secret Additive	-	Group 3	-	-	-
Titanium Dioxide 13463-67-7	-	Group 2B	-	X	-

ACGIH (American Conference of Governmental Industrial Hygienists)
A3 - Animal Carcinogen
IARC (International Agency for Research on Cancer)
Group 2B - Possibly Carcinogenic to Humans
Not classifiable as a human carcinogen
OSHA (Occupational Safety and Health Administration of the US Department of Labor)
X - Present

Reproductive toxicity No information available.
STOT - single exposure No information available.
STOT - repeated exposure No information available.
Aspiration hazard No information available.

Numerical measures of toxicity - Product Information

Unknown Acute Toxicity 0.20332554% of the mixture consists of ingredient(s) of unknown toxicity
The following values are calculated based on chapter 3.1 of the GHS document .

12. ECOLOGICAL INFORMATION

Ecotoxicity

8.86641% of the mixture consists of components(s) of unknown hazards to the aquatic environment

Chemical Name	Algae/aquatic plants	Fish	Crustacea
2-Butoxy Ethanol 111-76-2	-	1490: 96 h Lepomis macrochirus mg/L LC50 static 2950: 96 h Lepomis macrochirus mg/L LC50	1000: 48 h Daphnia magna mg/L EC50 1698 - 1940: 24 h Daphnia magna mg/L EC50

Persistence and degradability
No information available.

Bioaccumulation
No information available.

Chemical Name	Partition coefficient
2-Butoxy Ethanol 111-76-2	0.81

Other adverse effects No information available

13. DISPOSAL CONSIDERATIONS

Waste treatment methods

Disposal of wastes Residual vapors may explode on ignition. Never pierce, drill, grind, cut, saw or weld any empty container. Disposal should be in accordance with applicable regional, national and local laws and regulations. Since empty containers retain product residue, follow label warnings even after container is emptied.

14. TRANSPORT INFORMATION

Note: DOT Ground - "Non-bulk shipments may be non-regulated per 49CFR 173.150(f)(2)"

DOT
UN/ID No. NA1263
Proper shipping name Paint, combustible
Hazard Class Combustible liquid
Packing Group III

TDG Not regulated

MEX Not regulated

IATA Not regulated

IMDG Not regulated

15. REGULATORY INFORMATION

International Inventories

TSCA	Complies
DSL/NDSL	Not Determined
EINECS/ELINCS	Not Determined
ENCS	Not Determined
IECSC	Not Determined
KECL	Not Determined
PICCS	Not Determined
AICS	Not Determined

Legend:

TSCA - United States Toxic Substances Control Act Section 8(b) Inventory
DSL/NDSL - Canadian Domestic Substances List/Non-Domestic Substances List
EINECS/ELINCS - European Inventory of Existing Chemical Substances/European List of Notified Chemical Substances
ENCS - Japan Existing and New Chemical Substances
IECSC - China Inventory of Existing Chemical Substances
KECL - Korean Existing and Evaluated Chemical Substances
PICCS - Philippines Inventory of Chemicals and Chemical Substances
AICS - Australian Inventory of Chemical Substances

US Federal Regulations

SARA 313

Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA). This product contains a chemical or chemicals which are subject to the reporting requirements of the Act and Title 40 of the Code of Federal Regulations, Part 372

Chemical Name	SARA 313 - Threshold Values %
2-Butoxy Ethanol - 111-76-2	1.0

SARA 311/312 Hazard Categories

Acute health hazard	Yes
Chronic Health Hazard	Yes
Fire hazard	Yes
Sudden release of pressure hazard	No
Reactive Hazard	No

US State Regulations

This product may contain substances regulated by state right-to-know regulations

Chemical Name	New Jersey	Massachusetts	Pennsylvania	Pennsylvania - Special Hazardous Substances	Pennsylvania - Environmental Hazard List
2-Butoxy Ethanol 111-76-2	X	X	X	-	-
Trade Secret Additive	X	X	X	-	-
Triethylamine 121-44-8	X	X	X	-	X
Stoddard solvent, solvent naphta 8052-41-3	X	X	X	-	-
Ethanol, 2-(dimethylamino)- 108-01-0	X	X	X	-	-
2-Propanol 67-63-0	X	X	X	-	X
Titanium Dioxide 13463-67-7	X	X	X	-	-

Naphthalene 91-20-3	X	X	X	-	X
Nickel 7440-02-0	X	X	X	X	X
2-Methoxymethylethoxy propanol 34590-94-8	X	X	X	-	-
Ethylbenzene 100-41-4	X	X	X	-	X

16. OTHER INFORMATION

Issue Date 01-Jul-2015
Revision Date 01-Jul-2015
Revision Note No information available

Disclaimer

The information contained herein is derived from data provided by suppliers and other sources believed to be reliable, and is furnished without warranty of any kind. The information relating to the product is for guidance purposes only, is based only on downstream uses known to Watson Standard, and may not be valid for the product used in combination with any other materials. Users of this product must make determinations of suitability and completeness of information from this and all other sources to ensure proper use and disposal of this product, safety and health of employees, customers, and the protection of the environment. Watson Standard will not be liable for any special, incidental, or consequential damages associated with the use or handling of the product.

End of Safety Data Sheet

WATSON STANDARD
ISO 9001 - 2008

SAFETY DATA SHEET

Issue Date 16-Feb-2016 **Revision Date** 16-Feb-2016 **Version** 1

1. IDENTIFICATION OF THE SUBSTANCE/PREPARATION AND OF THE COMPANY/UNDERTAKING

Product identifier
Product Code 3230

Recommended use of the chemical and restrictions on use
Recommended Use Reserved for industrial and professional use.

Details of the supplier of the safety data sheet
Supplier Address
Watson Industrial Coatings Co. D.B.A Watson Standard
616 Hite Road
Harwick PA, 15049
USA
+1-724-275-1000

Emergency telephone number
Emergency Telephone Chemtrec USA 1-800-424-9300

2. HAZARDS IDENTIFICATION

Classification

OSHA Regulatory Status
This material is considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200)

Flammable liquids	Category 4
Skin corrosion/irritation	Category 2
Serious eye damage/eye irritation	Category 2
Specific target organ toxicity (single exposure)	Category 3

Hazard symbol(s) /Pictogram(s)

Emergency Overview

Warning

Hazard statements
H315 - Causes skin irritation
H319 - Causes serious eye irritation
H335 - May cause respiratory irritation
H336 - May cause drowsiness or dizziness
H227 - Combustible liquid

Precautionary Statements - Prevention
Wash face, hands and any exposed skin thoroughly after handling
Wear protective gloves/protective clothing/eye protection/face protection
Avoid breathing dust/fume/gas/mist/vapors/spray
Use only outdoors or in a well-ventilated area
Keep away from heat and sparks - No Smoking
Keep cool

Precautionary Statements - Response
Specific treatment (see .? on this label)
IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing
If eye irritation persists: Get medical advice/attention
IF ON SKIN: Wash with plenty of soap and water
If skin irritation occurs: Get medical advice/attention
Take off contaminated clothing and wash before reuse
IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing
Call a POISON CENTER or doctor/physician if you feel unwell
IF SWALLOWED: Call a POISON CENTER or doctor/physician if you feel unwell
Rinse mouth
In case of fire: Use CO2, dry chemical, or foam for extinction

Precautionary Statements - Storage
Store in a well-ventilated place. Keep container tightly closed
Store locked up

Precautionary Statements - Disposal
Dispose of contents/container to an approved waste disposal plant

Hazards not otherwise classified (HNOC)
Not Applicable

3. COMPOSITION/INFORMATION ON INGREDIENTS

Chemical Name	CAS No	Weight-%
2-Butoxy Ethanol	111-76-2	10 - 30
Iron hydroxide oxide (Fe(OH)O)	20344-49-4	5 - 10
Triethylamine	121-44-8	1 - 5
Titanium Dioxide	13463-67-7	0.1 - 1
Stoddard Solvent, solvent naphta	8052-41-3	0.1 - 1

4. FIRST AID MEASURES

First aid measures

Eye contact — IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists: Get medical advice/attention.

Skin Contact — Wash off immediately with soap and plenty of water while removing all contaminated clothes and shoes. If symptoms persist, call a physician.

Inhalation — Move to fresh air in case of accidental inhalation of vapors. If symptoms persist, call a physician.

Ingestion — If swallowed, call a poison control center or physician immediately. Never give anything by mouth to an unconscious person. Do not induce vomiting without medical advice.

5. FIRE-FIGHTING MEASURES

Suitable extinguishing media
Carbon dioxide (CO2). Extinguishing powder. Dry chemical. Alcohol resistant foam. Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.

Specific hazards arising from the chemical
No information available.

Explosion data
Sensitivity to Mechanical Impact No.
Sensitivity to Static Discharge Yes.

Protective equipment and precautions for firefighters
Wear self-contained breathing apparatus and protective suit.

6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures

Personal precautions	ELIMINATE all ignition sources (no smoking, flares, sparks or flames in immediate area). Ensure adequate ventilation, especially in confined areas. Avoid contact with skin, eyes or clothing. All equipment used when handling the product must be grounded. Use personal protection recommended in Section 8. Wash thoroughly after handling.

Methods and material for containment and cleaning up

Methods for containment	Prevent further leakage or spillage if safe to do so.
Methods for cleaning up	Pick up and transfer to properly labeled containers. Soak up with inert absorbent material. Clean contaminated surface thoroughly. Prevent product from entering drains. Take precautionary measures against static discharges. Sweep up and shovel into suitable containers for disposal.

7. HANDLING AND STORAGE

Precautions for safe handling

Advice on safe handling	Avoid contact with skin, eyes or clothing. Do not breathe dust/fume/gas/mist/vapors/spray. Wash contaminated clothing before reuse. Take precautionary measures against static discharges. Use spark-proof tools and explosion-proof equipment. Ensure adequate ventilation, especially in confined areas. Remove all sources of ignition. Keep away from heat/sparks/open flames/hot surfaces. - No smoking. Do not eat, drink or smoke when using this product. Wash thoroughly after handling. Never pierce, drill, grind, cut, saw or weld any empty container.

Conditions for safe storage, including any incompatibilities

Storage Conditions	Keep containers tightly closed in a dry, cool and well-ventilated place.
Incompatible materials	Strong oxidizing agents. Strong acids. Strong bases.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Control parameters

Chemical Name	ACGIH TLV	OSHA PEL	NIOSH IDLH	Exposure Limits

2-Butoxy Ethanol 111-76-2	TWA: 20 ppm	TWA: 50 ppm TWA: 240 mg/m³ (vacated) TWA: 25 ppm (vacated) TWA: 120 mg/m³ (vacated) S* S*	IDLH: 700 ppm TWA: 5 ppm TWA: 24 mg/m³	Mexico: TWA 26 ppm Mexico: TWA 120 mg/m³ Mexico: STEL 75 ppm Mexico: STEL 360 mg/m³
Iron hydroxide oxide (Fe(OH)O) 20344-49-4	TWA: 1 mg/m³ Fe	(vacated) TWA: 1 mg/m³ Fe	TWA: 1 mg/m³ Fe	Mexico: TWA 1 mg/m³ Mexico: STEL 2 mg/m³
Triethylamine 121-44-8	STEL: 3 ppm TWA: 1 ppm S*	TWA: 25 ppm TWA: 100 mg/m³ (vacated) TWA: 10 ppm (vacated) TWA: 40 mg/m³ (vacated) STEL: 15 ppm (vacated) STEL: 60 mg/m³	IDLH: 200 ppm	Mexico: TWA 25 ppm Mexico: TWA 100 mg/m³ Mexico: STEL 40 ppm Mexico: STEL 160 mg/m³
Titanium Dioxide 13463-67-7	TWA: 10 mg/m³	TWA: 15 mg/m³ total dust (vacated) TWA: 10 mg/m³ total dust	IDLH: 5000 mg/m³	Mexico: TWA 10 mg/m³ Mexico: STEL 20 mg/m³
Stoddard Solvent, solvent naphta 8052-41-3	TWA: 100 ppm	TWA: 500 ppm TWA: 2900 mg/m³ (vacated) TWA: 100 ppm (vacated) TWA: 525 mg/m³	IDLH: 20000 mg/m³ Ceiling: 1800 mg/m³ 15 min TWA: 350 mg/m³	Mexico: TWA 100 ppm Mexico: TWA 523 mg/m³ Mexico: STEL 200 ppm Mexico: STEL 1050 mg/m³

NIOSH IDLH Immediately Dangerous to Life or Health

Other Information Vacated limits revoked by the Court of Appeals decision in AFL-CIO v. OSHA, 965 F.2d 962 (11th Cir., 1992).

Appropriate engineering controls

Engineering Controls Showers
Eyewash stations
Ventilation systems.

Individual protection measures, such as personal protective equipment

Eye/face protection Wear safety glasses with side shields (or goggles).

Skin and body protection Wear impervious protective clothing, including boots, gloves, lab coat, apron or coveralls, as appropriate, to prevent skin contact.

Respiratory protection If exposure limits are exceeded or irritation is experienced, NIOSH/MSHA approved respiratory protection should be worn. Positive-pressure supplied air respirators may be required for high airborne contaminant concentrations. Respiratory protection must be provided in accordance with current local regulations.

General Hygiene Considerations Handle in accordance with good industrial hygiene and safety practice.

9. PHYSICAL AND CHEMICAL PROPERTIES

Information on basic physical and chemical properties

Physical state liquid
Odor Alcohol
Color opaque, red

Property	Values	Remarks • Method
pH	No information available	
Melting point / freezing point	No information available	
Boiling point / boiling range	No information available	
Flash Point	65.5 °C / 150.0 °F	Pensky-Martens Closed Cup (PMCC)
Evaporation rate	No information available	
Flammability (solid, gas)	No information available	
Flammability Limit in Air		

Upper flammability limit:	No information available
Lower flammability limit:	No information available
Vapor pressure	No information available
Vapor density	No information available
Specific Gravity	1.06
Water solubility	Soluble in water
Solubility in other solvents	No information available
Partition coefficient	No information available
Autoignition temperature	No information available
Decomposition temperature	No information available
Viscosity	No information available
Explosive properties	No information available
Oxidizing properties	No information available

Other Information

Softening point	No information available
Molecular weight	No information available
VOC Content (%)	No information available
Density	8.79 lb/gal +/- 0.20
Bulk density	No information available

10. STABILITY AND REACTIVITY

Reactivity
Not Applicable

Chemical stability
Stable under normal conditions.

Possibility of Hazardous Reactions
None under normal processing.

Hazardous polymerization Hazardous polymerization does not occur.

Conditions to avoid
Heat, flames and sparks.

Incompatible materials
Strong oxidizing agents. Strong acids. Strong bases.

Hazardous Decomposition Products
None under normal use conditions. Thermal decomposition can lead to release of irritating and toxic gases and vapors. Carbon dioxide (CO2). Hydrocarbons.

11. TOXICOLOGICAL INFORMATION

Information on likely routes of exposure

Product Information No data available

Inhalation No data available.

Eye contact No data available.

Skin Contact No data available.

Ingestion No data available.

Chemical Name	Oral LD50	Dermal LD50	Inhalation LC50
2-Butoxy Ethanol 111-76-2	= 470 mg/kg (Rat)	= 99 mg/kg (Rabbit)	= 450 ppm (Rat) 4 h

Iron hydroxide oxide (Fe(OH)O) 20344-49-4	> 10000 mg/kg (Rat)	-	-
Triethylamine 121-44-8	= 460 mg/kg (Rat)	= 415 mg/kg (Rabbit) = 570 µL/kg (Rabbit)	= 1250 ppm (Rat) 4 h
Titanium Dioxide 13463-67-7	> 10000 mg/kg (Rat)	-	-

Information on toxicological effects

Symptoms No information available.

Delayed and immediate effects as well as chronic effects from short and long-term exposure

Sensitization No information available.
Germ cell mutagenicity No information available.
Carcinogenicity This product contains one or more substances which are classified by IARC as carcinogenic to humans (Group I), probably carcinogenic to humans (Group 2A) or possibly carcinogenic to humans (Group 2B). This product contains titanium dioxide which is classified as a possible carcinogen when present as respirable dust. This is not relevant for this product since it is a liquid.

Chemical Name	ACGIH	IARC	NTP	OSHA	Mexico
2-Butoxy Ethanol 111-76-2	A3	Group 3	-	-	-
Titanium Dioxide 13463-67-7	-	Group 2B	-	X	-

ACGIH (American Conference of Governmental Industrial Hygienists)
A3 - Animal Carcinogen
IARC (International Agency for Research on Cancer)
Group 2B - Possibly Carcinogenic to Humans
Not classifiable as a human carcinogen
NTP (National Toxicology Program)
Known - Known Carcinogen
OSHA (Occupational Safety and Health Administration of the US Department of Labor)
X - Present

Reproductive toxicity No information available.
STOT - single exposure No information available.
STOT - repeated exposure No information available.
Chronic toxicity May cause adverse effects on the bone marrow and blood-forming system. May cause adverse liver effects.
Target Organ Effects blood, Central nervous system, Eyes, Hematopoietic System, kidney, liver, lungs, Respiratory system, Skin, Bladder, Central Vascular System (CVS), Gastrointestinal tract (GI).
Aspiration hazard No information available.

Numerical measures of toxicity - Product Information

Unknown Acute Toxicity 3.15767665% of the mixture consists of ingredient(s) of unknown toxicity
The following values are calculated based on chapter 3.1 of the GHS document . mg/kg mg/l

12. ECOLOGICAL INFORMATION

Ecotoxicity

9.50948% of the mixture consists of components(s) of unknown hazards to the aquatic environment

Chemical Name	Algae/aquatic plants	Fish	Crustacea
2-Butoxy Ethanol 111-76-2	-	1490: 96 h Lepomis macrochirus mg/L LC50 static 2950: 96 h Lepomis macrochirus mg/L LC50	1000: 48 h Daphnia magna mg/L EC50 1698 - 1940: 24 h Daphnia magna mg/L EC50
Triethylamine 121-44-8	-	43.7: 96 h Pimephales promelas mg/L LC50 static	200: 48 h Daphnia magna mg/L EC50

Persistence and degradability
No information available.

Bioaccumulation
No information available.

Chemical Name	Partition coefficient
2-Butoxy Ethanol 111-76-2	0.81
Triethylamine 121-44-8	1.45

Other adverse effects No information available

13. DISPOSAL CONSIDERATIONS

Waste treatment methods

Disposal of wastes Residual vapors may explode on ignition. Never pierce, drill, grind, cut, saw or weld any empty container. Disposal should be in accordance with applicable regional, national and local laws and regulations. Since empty containers retain product residue, follow label warnings even after container is emptied.

14. TRANSPORT INFORMATION

Note: DOT Ground - "Non-bulk shipments may be non-regulated per 49CFR 173.150(f)(2)"

DOT

UN/ID No.	NA1263
Proper shipping name	Paint, combustible
Hazard Class	Combustible Liquid
Packing Group	III

TDG Not regulated

MEX Not regulated

IATA Not regulated

IMDG Not regulated

15. REGULATORY INFORMATION

International Inventories

TSCA	Complies
DSL/NDSL	Not Determined
ENCS	Not Determined
IECSC	Not Determined
KECL	Not Determined
PICCS	Not Determined
AICS	Not Determined

Legend:
TSCA - United States Toxic Substances Control Act Section 8(b) Inventory
DSL/NDSL - Canadian Domestic Substances List/Non-Domestic Substances List
EINECS/ELINCS - European Inventory of Existing Chemical Substances/European List of Notified Chemical Substances
ENCS - Japan Existing and New Chemical Substances
IECSC - China Inventory of Existing Chemical Substances
KECL - Korean Existing and Evaluated Chemical Substances
PICCS - Philippines Inventory of Chemicals and Chemical Substances
AICS - Australian Inventory of Chemical Substances

US Federal Regulations

SARA 313

Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA). This product contains a chemical or chemicals which are subject to the reporting requirements of the Act and Title 40 of the Code of Federal Regulations, Part 372

Chemical Name	SARA 313 - Threshold Values %
2-Butoxy Ethanol - 111-76-2	1.0
Triethylamine - 121-44-8	1.0

SARA 311/312 Hazard Categories

Acute health hazard	Yes
Chronic Health Hazard	No
Fire hazard	Yes
Sudden release of pressure hazard	No
Reactive Hazard	No

US State Regulations

This product may contain substances regulated by state right-to-know regulations

Chemical Name	New Jersey	Massachusetts	Pennsylvania	Pennsylvania - Special Hazardous Substances	Pennsylvania - Environmental Hazard List
2-Butoxy Ethanol 111-76-2	X	X	X	-	-
Triethylamine 121-44-8	X	X	X	-	X
Titanium Dioxide 13463-67-7	X	X	X	-	-
Stoddard Solvent, solvent naphta 8052-41-3	X	X	X	-	-
2-Dimethylaminoethanol 108-01-0	X	X	X	-	-
Iron oxide (Fe2O3) 1309-37-1	X	X	X	-	-
2-Propanol 67-63-0	X	X	X	-	X
Cumene 98-82-8	X	X	X	-	X
Naphthalene 91-20-3	X	X	X	-	X
2-Methoxymethylethoxy propanol 34590-94-8	X	X	X	-	-
Ethylbenzene 100-41-4	X	X	X	-	X

16. OTHER INFORMATION

Issue Date	16-Feb-2016
Revision Date	16-Feb-2016
Revision Note	Not Applicable

Disclaimer

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End of Safety Data Sheet

WATSON STANDARD® SAFETY DATA SHEET

Issue Date 28-Oct-2015 **Revision Date** 10-Nov-2015 **Version** 1

1. IDENTIFICATION OF THE SUBSTANCE/PREPARATION AND OF THE COMPANY/UNDERTAKING

Product identifier
Product Code 3232

Recommended use of the chemical and restrictions on use
Recommended Use Reserved for industrial and professional use.

Details of the supplier of the safety data sheet
Supplier Address
Watson Industrial Coatings Co. D.B.A Watson Standard
616 Hite Road
Harwick PA, 15049
USA
+1-724-275-1000

Emergency telephone number
Emergency Telephone Chemtrec 1-800-424-9300

2. HAZARDS IDENTIFICATION

Classification

OSHA Regulatory Status
This material is considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200)

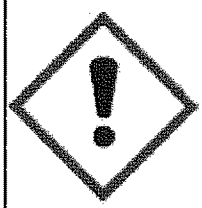
Skin corrosion/irritation	Category 2
Serious eye damage/eye irritation	Category 2

Hazard symbol(s) /Pictogram(s)

Emergency Overview

Warning

Hazard statements
H315 - Causes skin irritation
H319 - Causes serious eye irritation



Precautionary Statements - Prevention
Wash face, hands and any exposed skin thoroughly after handling
Wear protective gloves/protective clothing/eye protection/face protection

Precautionary Statements - Response
Specific treatment (see .? on this label)
IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing
If eye irritation persists: Get medical advice/attention
IF ON SKIN: Wash with plenty of soap and water
If skin irritation occurs: Get medical advice/attention
Take off contaminated clothing and wash before reuse

IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing
Call a POISON CENTER or doctor/physician if you feel unwell
IF SWALLOWED: Call a POISON CENTER or doctor/physician if you feel unwell
Rinse mouth
In case of fire: Use CO2, dry chemical, or foam for extinction
Evacuate area and fight fire from a safe distance

Precautionary Statements - Storage
Store in accordance with local regulations
Store in a well-ventilated place. Keep container tightly closed

Precautionary Statements - Disposal
Dispose of in accordance with federal, state and local regulations

Hazards not otherwise classified (HNOC)
Not Applicable

3. COMPOSITION/INFORMATION ON INGREDIENTS

Chemical Name	CAS No	Weight-%
2-Butoxy Ethanol	111-76-2	10 - 30
Titanium Dioxide	13463-67-7	1 - 5
Copper(III) phthalocyanine	147-14-8	1 - 5
Triethylamine	121-44-8	1 - 5
Stoddard Solvent, solvent naphta	8052-41-3	0.1 - 1

4. FIRST AID MEASURES

First aid measures

Eye contact IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists: Get medical advice/attention.

Skin Contact Wash off immediately with soap and plenty of water while removing all contaminated clothes and shoes. If symptoms persist, call a physician.

Inhalation Move to fresh air in case of accidental inhalation of vapors. If symptoms persist, call a physician.

Ingestion If swallowed, call a poison control center or physician immediately. Never give anything by mouth to an unconscious person. Do not induce vomiting without medical advice.

5. FIRE-FIGHTING MEASURES

Suitable extinguishing media
Use. Dry chemical. Carbon dioxide (CO2). Water spray (fog). Alcohol resistant foam.

Unsuitable extinguishing media Do not use a solid water stream as it may scatter and spread fire.

Specific hazards arising from the chemical
No information available.

Explosion data
Sensitivity to Mechanical Impact No.
Sensitivity to Static Discharge Yes.

Protective equipment and precautions for firefighters
Wear self-contained breathing apparatus and protective suit.

6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures

Personal precautions ELIMINATE all ignition sources (no smoking, flares, sparks or flames in immediate area). Ensure adequate ventilation, especially in confined areas. Avoid contact with skin, eyes or clothing. All equipment used when handling the product must be grounded. Use personal protection recommended in Section 8. Wash thoroughly after handling.

Methods and material for containment and cleaning up

Methods for containment Prevent further leakage or spillage if safe to do so.

Methods for cleaning up Pick up and transfer to properly labeled containers. Soak up with inert absorbent material. Clean contaminated surface thoroughly. Prevent product from entering drains. Take precautionary measures against static discharges. Sweep up and shovel into suitable containers for disposal.

7. HANDLING AND STORAGE

Precautions for safe handling

Advice on safe handling Avoid contact with skin, eyes or clothing. Do not breathe dust/fume/gas/mist/vapors/spray. Wash contaminated clothing before reuse. Take precautionary measures against static discharges. Use spark-proof tools and explosion-proof equipment. Ensure adequate ventilation, especially in confined areas. Remove all sources of ignition. Keep away from heat/sparks/open flames/hot surfaces. - No smoking. Do not eat, drink or smoke when using this product. Wash thoroughly after handling. Never pierce, drill, grind, cut, saw or weld any empty container.

Conditions for safe storage, including any incompatibilities

Storage Conditions Keep containers tightly closed in a dry, cool and well-ventilated place.

Incompatible materials Strong oxidizing agents. Strong acids. Strong bases.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Control parameters

Chemical Name	ACGIH TLV	OSHA PEL	NIOSH IDLH	Exposure Limits
2-Butoxy Ethanol 111-76-2	TWA: 20 ppm	TWA: 50 ppm TWA: 240 mg/m³ (vacated) TWA: 25 ppm (vacated) TWA: 120 mg/m³ (vacated) S* S*	IDLH: 700 ppm TWA: 5 ppm TWA: 24 mg/m³	Mexico: TWA 26 ppm Mexico: TWA 120 mg/m³ Mexico: STEL 75 ppm Mexico: STEL 360 mg/m³
Titanium Dioxide 13463-67-7	TWA: 10 mg/m³	TWA: 15 mg/m³ total dust (vacated) TWA: 10 mg/m³ total dust	IDLH: 5000 mg/m³	Mexico: TWA 10 mg/m³ Mexico: STEL 20 mg/m³
Copper(II) phthalocyanine 147-14-8	TWA: 1 mg/m³ Cu dust and mist	-	IDLH: 100 mg/m³ Cu dust and mist TWA: 1 mg/m³ Cu dust and mist	-
Triethylamine 121-44-8	STEL: 3 ppm TWA: 1 ppm S*	TWA: 25 ppm TWA: 100 mg/m³ (vacated) TWA: 10 ppm (vacated) TWA: 40 mg/m³ (vacated) STEL: 15 ppm (vacated) STEL: 60 mg/m³	IDLH: 200 ppm	Mexico: TWA 25 ppm Mexico: TWA 100 mg/m³ Mexico: STEL 40 ppm Mexico: STEL 160 mg/m³

Stoddard Solvent, solvent naphta 8052-41-3	TWA: 100 ppm	TWA: 500 ppm TWA: 2900 mg/m³ (vacated) TWA: 100 ppm (vacated) TWA: 525 mg/m³	IDLH: 20000 mg/m³ Ceiling: 1800 mg/m³ 15 min TWA: 350 mg/m³	Mexico: TWA 100 ppm Mexico: TWA 523 mg/m³ Mexico: STEL 200 ppm Mexico: STEL 1050 mg/m³

NIOSH IDLH Immediately Dangerous to Life or Health

Other Information Vacated limits revoked by the Court of Appeals decision in AFL-CIO v. OSHA, 965 F.2d 962 (11th Cir., 1992).

Appropriate engineering controls

Engineering Controls Showers
Eyewash stations
Ventilation systems.

Individual protection measures, such as personal protective equipment

Eye/face protection Tight sealing safety goggles. Face protection shield.

Skin and body protection Wear impervious protective clothing, including boots, gloves, lab coat, apron or coveralls, as appropriate, to prevent skin contact.

Respiratory protection If exposure limits are exceeded or irritation is experienced, NIOSH/MSHA approved respiratory protection should be worn. Positive-pressure supplied air respirators may be required for high airborne contaminant concentrations. Respiratory protection must be provided in accordance with current local regulations.

General Hygiene Considerations Handle in accordance with good industrial hygiene and safety practice.

9. PHYSICAL AND CHEMICAL PROPERTIES

Information on basic physical and chemical properties

Physical state liquid
Odor Amines
Color opaque, blue

Property	Values	Remarks • Method
pH	No information available	
Melting point / freezing point	No information available	
Boiling point / boiling range	No information available	
Flash Point	> 93.5 °C / > 200.0 °F	
Evaporation rate	No information available	
Flammability (solid, gas)	No information available	
Flammability Limit in Air		
Upper flammability limit:	No information available	
Lower flammability limit:	No information available	
Vapor pressure	No information available	
Vapor density	No information available	
Specific Gravity	1.03	
Water solubility	Soluble in water	
Solubility in other solvents	No information available	
Partition coefficient	No information available	
Autoignition temperature	No information available	
Decomposition temperature	No information available	
Viscosity	No information available	
Explosive properties	No information available	
Oxidizing properties	No information available	

Other Information

Softening point No information available

Molecular weight	No information available
VOC Content (%)	No information available
Density	8.60 lb/gal +/- 0.20
Bulk density	No information available

10. STABILITY AND REACTIVITY

Reactivity
Not Applicable

Chemical stability
Stable under normal conditions.

Possibility of Hazardous Reactions
None under normal processing.

Hazardous polymerization Hazardous polymerization does not occur.

Conditions to avoid
Heat, flames and sparks.

Incompatible materials
Strong oxidizing agents. Strong acids. Strong bases.

Hazardous Decomposition Products
None under normal use conditions. Thermal decomposition can lead to release of irritating and toxic gases and vapors. Carbon dioxide (CO2). Hydrocarbons.

11. TOXICOLOGICAL INFORMATION

Information on likely routes of exposure

Product Information No data available

Inhalation No data available.

Eye contact No data available.

Skin Contact No data available.

Ingestion No data available.

Chemical Name	Oral LD50	Dermal LD50	Inhalation LC50
2-Butoxy Ethanol 111-76-2	= 470 mg/kg (Rat)	= 99 mg/kg (Rabbit)	= 450 ppm (Rat) 4 h
Titanium Dioxide 13463-67-7	> 10000 mg/kg (Rat)	-	-
Triethylamine 121-44-8	= 460 mg/kg (Rat)	= 415 mg/kg (Rabbit) = 570 µL/kg (Rabbit)	= 1250 ppm (Rat) 4 h

Information on toxicological effects

Symptoms No information available.

Delayed and immediate effects as well as chronic effects from short and long-term exposure

Sensitization	No information available.
Germ cell mutagenicity	No information available.
Carcinogenicity	This product contains one or more substances which are classified by IARC as carcinogenic to humans (Group I), probably carcinogenic to humans (Group 2A) or possibly carcinogenic to humans (Group 2B). This product contains titanium dioxide which is classified as a possible carcinogen when present as respirable dust. This is not relevant for this product since it is a liquid.

Chemical Name	ACGIH	IARC	NTP	OSHA	Mexico
2-Butoxy Ethanol 111-76-2	A3	Group 3	-	-	-
Titanium Dioxide 13463-67-7	-	Group 2B	-	X	-

ACGIH (American Conference of Governmental Industrial Hygienists)
A3 - Animal Carcinogen
IARC (International Agency for Research on Cancer)
Group 2B - Possibly Carcinogenic to Humans
Not classifiable as a human carcinogen
OSHA (Occupational Safety and Health Administration of the US Department of Labor)
X - Present

Reproductive toxicity No information available.
STOT - single exposure No information available.
STOT - repeated exposure No information available.
Chronic toxicity Repeated contact may cause allergic reactions in very susceptible persons. Avoid repeated exposure. May cause adverse effects on the bone marrow and blood-forming system. May cause adverse liver effects.
Target Organ Effects blood, Central nervous system, Eyes, Hematopoietic System, kidney, liver, lungs, Respiratory system, Skin, Central Vascular System (CVS).
Aspiration hazard No information available.

Numerical measures of toxicity - Product Information

Unknown Acute Toxicity 1.94897999% of the mixture consists of ingredient(s) of unknown toxicity
The following values are calculated based on chapter 3.1 of the GHS document .

12. ECOLOGICAL INFORMATION

Ecotoxicity

2.479% of the mixture consists of components(s) of unknown hazards to the aquatic environment

Chemical Name	Algae/aquatic plants	Fish	Crustacea
2-Butoxy Ethanol 111-76-2	-	1490: 96 h Lepomis macrochirus mg/L LC50 static 2950: 96 h Lepomis macrochirus mg/L LC50	1000: 48 h Daphnia magna mg/L EC50 1698 - 1940: 24 h Daphnia magna mg/L EC50
Copper(III) phthalocyanine 147-14-8	-	100: 48 h Oryzias latipes mg/L LC50 static	-
Triethylamine 121-44-8	-	43.7: 96 h Pimephales promelas mg/L LC50 static	200: 48 h Daphnia magna mg/L EC50

Persistence and degradability
No information available.

Bioaccumulation
No information available.

Chemical Name	Partition coefficient
2-Butoxy Ethanol 111-76-2	0.81
Copper(III) phthalocyanine 147-14-8	6.6
Triethylamine 121-44-8	1.45

Other adverse effects No information available

13. DISPOSAL CONSIDERATIONS

Waste treatment methods

Disposal of wastes Residual vapors may explode on ignition. Never pierce, drill, grind, cut, saw or weld any empty container. Disposal should be in accordance with applicable regional, national and local laws and regulations. Since empty containers retain product residue, follow label warnings even after container is emptied.

14. TRANSPORT INFORMATION

DOT	Not regulated
TDG	Not regulated
MEX	Not regulated
IATA	Not regulated
IMDG	Not regulated

15. REGULATORY INFORMATION

International Inventories

TSCA	Complies
DSL/NDSL	Not Determined
ENCS	Not Determined
IECSC	Not Determined
KECL	Not Determined
PICCS	Not Determined
AICS	Not Determined

Legend:

TSCA - United States Toxic Substances Control Act Section 8(b) Inventory
DSL/NDSL - Canadian Domestic Substances List/Non-Domestic Substances List
EINECS/ELINCS - European Inventory of Existing Chemical Substances/European List of Notified Chemical Substances
ENCS - Japan Existing and New Chemical Substances
IECSC - China Inventory of Existing Chemical Substances
KECL - Korean Existing and Evaluated Chemical Substances
PICCS - Philippines Inventory of Chemicals and Chemical Substances
AICS - Australian Inventory of Chemical Substances

US Federal Regulations

SARA 313

Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA). This product contains a chemical or chemicals which are subject to the reporting requirements of the Act and Title 40 of the Code of Federal Regulations, Part 372

Chemical Name	SARA 313 - Threshold Values %
2-Butoxy Ethanol - 111-76-2	1.0
Copper(III) phthalocyanine - 147-14-8	1.0
Triethylamine - 121-44-8	1.0

SARA 311/312 Hazard Categories

Acute health hazard	Yes
Chronic Health Hazard	No
Fire hazard	No
Sudden release of pressure hazard	No
Reactive Hazard	No

US State Regulations

This product may contain substances regulated by state right-to-know regulations

Chemical Name	New Jersey	Massachusetts	Pennsylvania	Pennsylvania - Special Hazardous Substances	Pennsylvania - Environmental Hazard List
2-Butoxy Ethanol 111-76-2	X	X	X	-	-
Titanium Dioxide 13463-67-7	X	X	X	-	-
Copper(III) phthalocyanine 147-14-8	X	-	X	-	-
Triethylamine 121-44-8	X	X	X	-	X
Stoddard Solvent, solvent naphta 8052-41-3	X	X	X	-	-
2-Dimethylaminoethanol 108-01-0	X	X	X	-	-
Cobalt bis(2-ethylhexanoate) 136-52-7	X	-	X	-	-
Cumene 98-82-8	X	X	X	-	X
Naphthalene 91-20-3	X	X	X	-	X
2-Methoxymethylethoxy propanol 34590-94-8	X	X	X	-	-
Ethylbenzene 100-41-4	X	X	X	-	X

16. OTHER INFORMATION

Issue Date 28-Oct-2015
Revision Date 10-Nov-2015
Revision Note SDS sections updated 2 14

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End of Safety Data Sheet